COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources

WEST CENTRAL REGIONAL OFFICE
3019 Peters Creek Road
Roanoke, VA 24019

Thomas L. Hopkins
Director

Thomas L. Henderson
Regional Director

September 15, 1996
http://www.deq.state.va.us

Mr. Kaushik Vashee, HS&E Manager
Mr. Thomas Brown, Traffic & Distribution Manager
Hickson DanChem Corporation
PO Box 400
Danville VA 24543

RE: RCRA Inspection on August 7, 1996
Hickson DanChem Corporation
1975 Richmond Blvd; Danville VA
EPA ID# VAD988170684

Dear Gentlemen:

A compliance evaluation inspection (CEI) was conducted at the above referenced facility by the Virginia Department of Environmental Quality - West Central Regional Office (DEQ - WCRO). Thank you for your time and cooperation. I'm glad that Mr. Bill Sarnecky from the DEQ's Office of Pollution Prevention could join us, and hope his discussions were helpful. During this inspection, the facility was evaluated for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) as a Large Quantity Generator (LQG). Checklists completed for this inspection are enclosed in this report.

Thank you for your response letter dated September 9, 1996. I appreciate your enclosing a copy of Hickson DanChem's Pollution Prevention Plans, which will be maintained at DEQ's regional office. Based upon review of observations, responses, and documents obtained during and after this inspection, the Department has information that areas of non-compliance of the Virginia Waste Management Act (1950 Code of Virginia, as amended, § § 10.1-1400, et seq.) and/or applicable regulations of the VHWMR have occurred at the facility. The areas of non-compliance are noted in the checklists and as summarized below:

1. ***In apparent non-compliance with VHWMR § 5.3, there were two manifest violations surrounding the transporter section on shipping manifests.*** Specific information is as follows:

   * Manifest #95120 shipped on 4/7/95 had no transporter signature and date, as required by the VHWMR § 5.3.D. This deficiency cannot directly be corrected, only noted in the discrepancy section of the manifest.

   * Manifest #96106 shipped on 3/30/96 had no transporter EPA ID# in the appropriate section, in violation of VHWMR § 5.3.B.4. This violation was corrected on site when the number was researched and indicated on the manifest.

   You indicated in your letter that all future manifests will be reviewed thoroughly before the waste is sent off site. This action and response suffices and corrects these areas of non-compliance. No further response is necessary.

2. ***In apparent violation of VHWMR § 9.1.G.4.a, the job titles for each position related to hazardous waste management were not complete.*** The current job descriptions include only a generic statement indicating "waste handling", which are not specific to the job task/functions related to hazardous waste management. You indicated in your response that the facility will negotiate the expanded job descriptions during the upcoming contract negotiations. This response is acceptable to correct this deficiency. Please forward copies of the final task descriptions to me to be placed within the pollution prevention plans and finalize this matter.

It was my understanding during the inspection that annual TCLP analysis is performed on the contents of the equalization basin. I am requesting that copies of such annual reports be submitted to me for the past three (3) years. Please submit these copies no later than fifteen (15) calendar days from receipt of this report.

As mentioned above, these issues were discussed during the inspection and addressed in your response letter. However, please advise this office within ten (10) calendar days if this information is incorrect or if there is any other information that DEQ should consider. Please note that this information is not an agency proceeding or determination which may be considered a case decision under the Administrative Process Act (Va. Code §§ 9-6.14.1, et seq.). It does advise you that facts stated in this notice could provide the basis for a case decision or civil proceedings for non-compliance under Va. Code §§ 10.1-1402.19 and 10.1-1455, or other pertinent section of the Virginia Code, should DEQ take or seek actions authorized by law.

Thank you both again for your professionalism and the opportunity to observe operations at your facility. If you have any questions and/or if I can be of further assistance, please do not hesitate to call me at (540) 562-6819.

Sincerely,

Kimberly Batwinas

Kimberly Batwinas
Environmental Inspector Senior
Waste Compliance Division

Enclosures

c: Mr. Bill Sarnecky, DEQ Office of Pollution Prevention (w/o attachments)
Mr. Aziz Farahmand, Environmental Program Manager, DEQ-WCRO
Ms. Claire Slaughter, Office of Technical Assistance, DEQ-HQ
DEQ - West Central Regional Office Files

January 1994

DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: HICKSON DANCHEM CORPORATION

ADDRESS: 1975 RICHMOND BLVD (PO BOX 400)

DANVILLE VA 24543

EPA ID NUMBER: VAD 988170684

FACILITY REPRESENTATIVE: KAUSHIK VASHEE / THOMAS BROWN

TITLE: HS&E MANAGER / TRAFFIC + DISTRIBTN MNGR

TELEPHONE NUMBER: (804) 797-8120 [KAUSHIK ext. 131 TOM ext. 140] FAX: (804) 797-8111

INSPECTOR'S NAME: KIMBERLY BATWINAS

TITLE: ENVIRONMENTAL INSPECTOR SENIOR

DATE of INSPECTION: 7 AUGUST 1996

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1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling,etc.)

CHEMICAL MANUFACTURING SERVICE (SPECIALTY, INORGANIC + SYNTHETIC RESINS)

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

(D001 F003 F005) IGNITABLE SPENT SOLVENTS (methyl ethyl ketone, methanol, toluene, cyclohexane)

IGNITABLE SOLVENTS FROM laboratory (D001 F001 F003 U196)

Petroleum NAPHTHA /PARTS washers (D039)

Various STRIPPINGS FROM MANUF processes (D002 D001 U122)

VARIOUS IGNITABLE OFFSPEC commercial chemcl Products (D001 U147 U223)

(F005 D001) Various waste waters contaminated with MEK, butyl acrylate styrene, toluene

Waste IGNITABLE solids contamin. with solvents (clean ups) (D035 F003 F005 U056)

** PLEASE SEE DESCRIPTIONS OF WASTE STREAMS / ANNUAL REPORT THAT IS ATTACHED **

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
D001 (vinyl methether)	—	42,940 lbs
F001/F003	—	42,160 lbs
D039	—	221 lbs
D001/D002	—	3,800 lbs
U223	—	800 lbs

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)? YES (NO)

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste? YES (NO)
If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent?
(List all transporters and facilities, or on-site treatment performed).

* PLEASE SEE ATTACHMENT *

6. Does the facility generate any hazardous waste that is excluded from regulation? If yes, list the waste and the basis for exclusion. (YES) NO

Wastewaters neutralized PRIOR to discharge to EQUILIZATION BASIN then to City Danville POTW. Refer to VHWMR § 3.1.B.2+3 for exclusions.

7. Does the facility: (Generate) ONLY Market N/A Burn N/A used oil that is burned for energy recovery? **Underline or circle all that are applicable.** (If the facility **markets** or burns used oil, fill out the **Used Oil Checklist.**) YES (NO)

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste? If **YES**, then fill out the **Used Oil Checklist.**

fuels blending - hydraulic oils from machinery

8. Does the facility generate any hazardous waste that is reclaimed that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? YES (NO)

If **Yes**, list the waste, where it is sent, and complete the **Metals Recovery Checklist.**

N/A

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries? If **yes**, Underline or **circle** all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist.** YES (NO)

10. Based on the above, the facility is a:

a. conditionally exempt small quantity generator
b. small quantity generator
c. (generator LARGE QUANTITY)
d. permitted or interim status TSD
e. unpermitted TSD (explain in comments section)
f. transporter
g. other: please explain_____

[Underline or **Circle** All That Are Applicable]

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.] SA = Satellite accumulation area AA = 90 day accumulation area

Location	# of Containers	# of Tanks	Capacity
AA-1 (near truck loading station)	21 (all from Plant 1)	—	55 gal containers
SA-1 (lab @ PLANT 1)	1	—	55GAL

13. Comments:

- MR BILL SARNELY (DEQ - ENV. ENG. SR FROM THE OFFICE OF POLLUTION PREVENTION) WAS PRESENT DURING THE INSPECTION
- PLANT 1: currently manufactures polymer adhesives (denture material) which uses toluene in process as carrier
  PLANT 2: currently Calcium Hydroxide / Calcium Chloride for fiber protein
  PLANT 3: currently polymers + adhesives for personal care products
  PLANT 4: currently manuf. PIGMENTS using bolic, sulfuric (etc) ACIDS
- DEQ determined regulatory status for solvent contaminated wastewater on 1/18/95. Refer to attached letter.
- Type of manufacturing (thus waste generated) varies upon customer + product to be made.
- FACILITY / COMPANY owns 43 acres. 3 shifts, approx. 150 employees.
- VPDES General storm water Permit # VAR 120006.
- City Danville STP Indirect User Permit #20.

14. Waste Management Flow Diagram:

(Sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

*** PLEASE SEE ATTACHED PAGE ***

HICKSON DANCHEM CORPORATION
1975 Richmond Blvd (Rt 360 West)
Danville Virginia 24543
VAD988170684

DESCRIPTION OF WASTE STREAMS & ANNUAL REPORT 1995 SUMMARY

WASTE STREAM	PROCESS GENERATED	WASTE CODES	QUANTITY GENERATED
Ignitable Spent Solvents (MEK,methanol,toluene,cyclohexane)	reactor cleaning operations, production strippings, distillation	D001 F003 F005	1,053,531 lbs
Ignitable Lab Solvents	waste from laboratory	D001 F001 F003 U196	12,800 lbs
Petroleum Napthpa	parts washers cleaning systems	D039	1,273 lbs
Acetic Acid	strippings from manufacturing process	D002	16,240 lbs
Waste corrosive material/inorganic sludge	sulfuric acid storage tank clean out	D002	800 lbs
Corrosive liquid/sulfuric acid	off-spec manuf process malfunction	D002	41,250 lbs
Waste washwater (containing toluene)	boil out of reactor (cleaned with toluene)	F005	26,180 lbs
Toluene & Diisocyanate (reactive/toxic)	discarded commercial chem product	U223	890 lbs
Maleic anhydride	off-spec comm chemical product	U147	2,400 lbs
Vinyl acetate (ignitable)	off-spec comm chemical product	D001	800 lbs
Vinyl methyl ether (ignitable)	off-spec comm chemical product	D001	41,440 lbs
Ignitable wastewater (contam w/ butyl acrylate styrene)	contaminated process wastewater	D001	248,720 lbs
Spent non-halogentated solvents (corrosive)	cleanout of process drying equipment	D002 F005	400 lbs
Water contaminated with methyl ethyl ketone	run off water from release/fire response	F005	80,220 lbs
Methanol and methyl acrylate (ignitable strippings)	strippings from producation process	D001	37,925 lbs
Solid ignitable waste solvents (pig adsorbant, pads, etc)	cleanup of solvent leaks	D035 F003 F005 U056	4,300 lbs
Waste ignitable solids and liquid samples	mix of raw material & finished product	F003	4,000 lbs
Waste formaldehyde strippings	strippings from production process	U122	1,600 lbs
Waste formaldehyde liquid (ignitable)	stripped from producation process	D001 U122	2,400 lbs
Waste ignitable/corrosive liq (methyl acrylate & methacrylic acid)	waste from production error	D001 D002	400 lbs
Waste ignitable & corrosive liquids (toluene, butanol w/ high pH)	stripped from production process	D001 D002	1,200 lbs

HICKSON DANCHEM CORPORATION
1975 Richmond Blvd (Rt 360 West)
Danville Virginia 24543
VAD988170684

DESCRIPTION OF TRANSPORTERS AND TREATMENT/DISPOSAL FACILITIES

TRANSPORTERS USED	EPA ID#
SOUTHEASTERN CHEMICAL & SOLVENT	SCD036275626
SAFETY KLEEN CORP	ILD984908202
SUITLES TRUCK LEASING	ALD095704011
LWD TRUCKING	KYD981477821
MONTGOMERY TANK LINES	KYD985071760
LAIDLAW ENVIRONMENTAL	MDD980554653
MC TANK	OHD987016003
ROLLINS	DED982565947
SJ TRANSPORTATION CO	NJD071629976
ALLWORTH OF TENNESSEE	TND981920119
ECOFLOW	NCD980842132
THOMPSON TRUCKING	VAD988173431
SOUTHCO ENTERPRISES	NCR000002501

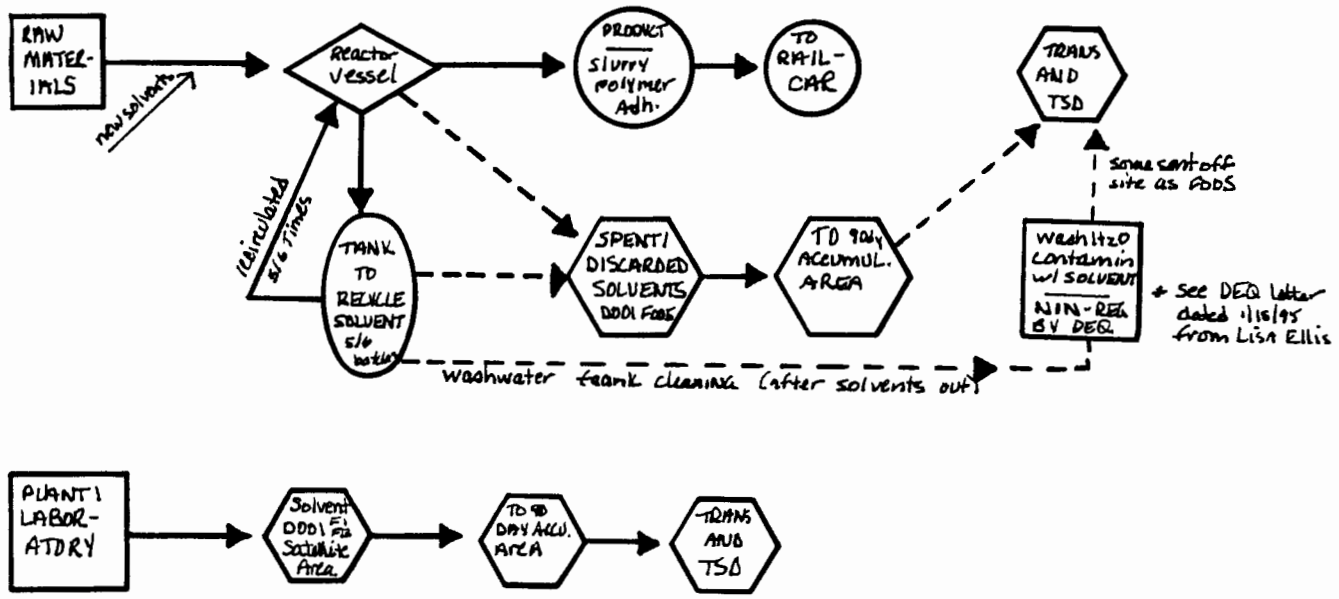
TREATMENT/DISPOSAL FACILITIES USED	EPA ID#
ECOFLO	NCD980842132
PETROCHEM	MID980615298
LAIDLAW ENVIRONMENTAL	NCD000648451
ROLLINS ENVIRONMENTAL	TND981920119
SAFETY KLEEN CORPORATION	VAD000737361
WASTE TECHNOLOGIES INDUSTRIES	OHD980613541
LWD INC	KYD088438817
ALL WORTH OF TENNESSEE	TND981920119

* spent solvents are fuels blended, petroleum naphtha is reclaimed, corrosive strippings incinerated, corrosive liquids from off spec manuf process are incinerated, washwater (boil out) incinerated, off spec commercial chemical products incinerated, solids contaminated w/ solvents are incinerated

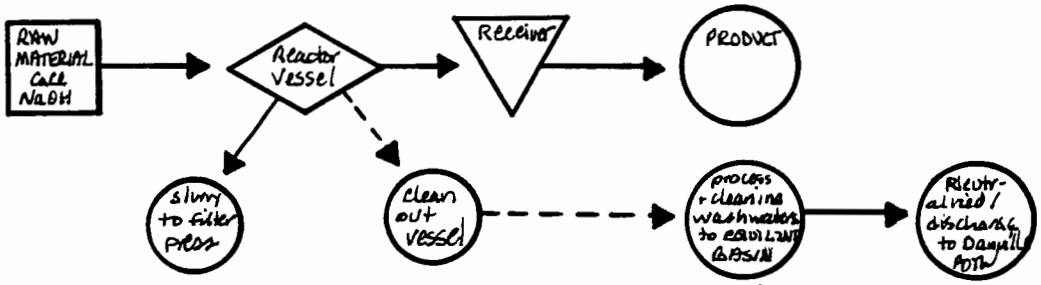
HICKSON DANCHEM CORPORATION

1975 Richmond Blvd
Martinsville VA 24112
VAD988170684

PLANT 1 PRODUCT - POLYMER ADHESIVES (TOLUENE)

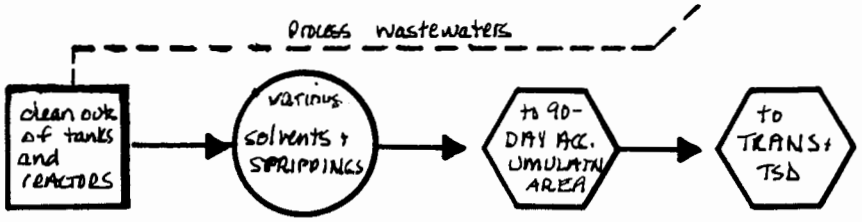


PLANT 2 CHEMICALS FOR FIBER PRODUCTION



PLANT 3 polymers + adhesives for personal care products

PLANT 4 pigment manufacturing

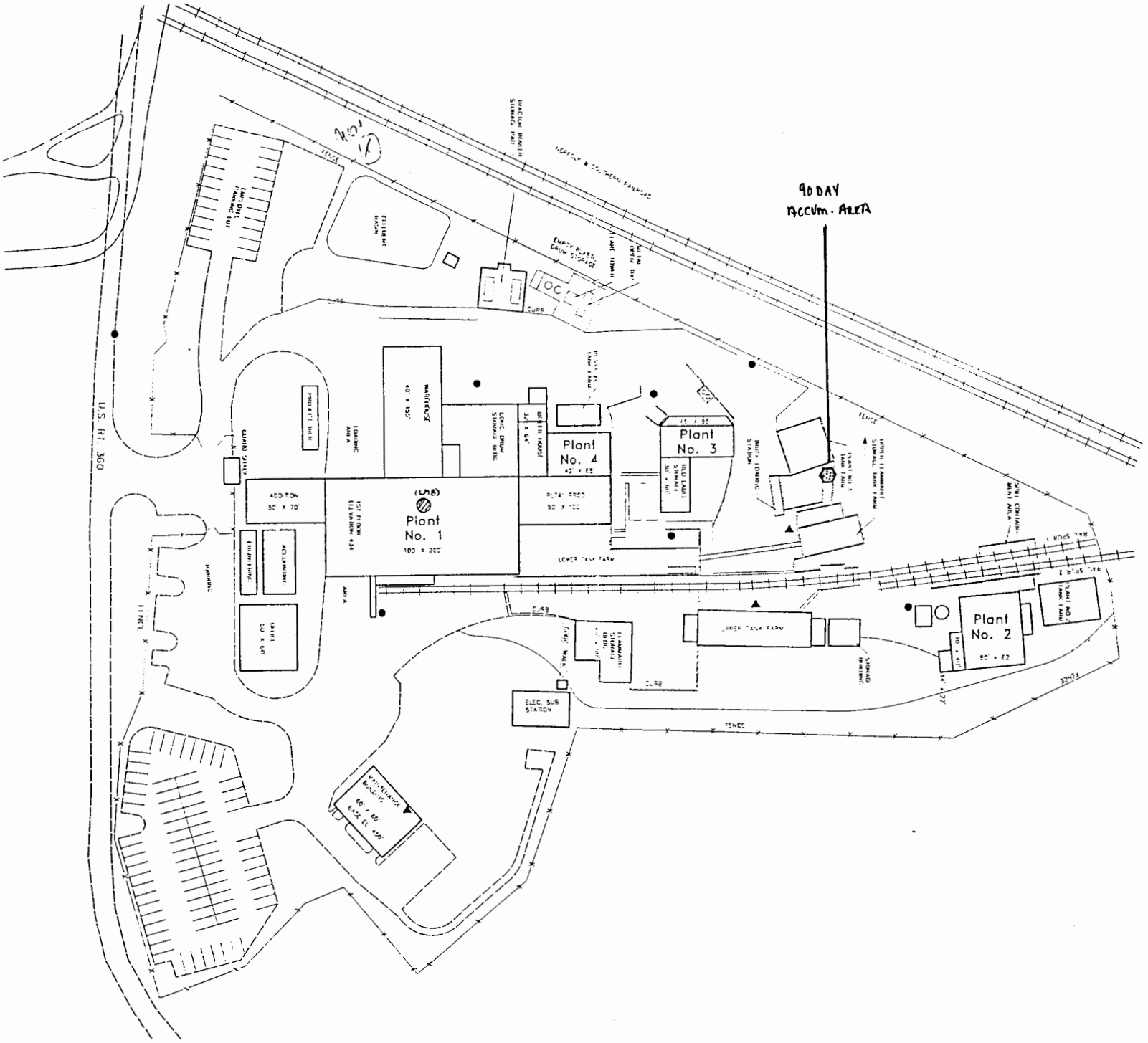


9/96
kjb

* PARTS WASHERS THROUGHOUT PLANTS. SERVICED, TRANSPORTED + TREATED/DISPOSED BY SAFETY KLEEN

Site Plan
Hickson DanChem
Danville, Virginia

1975 RICHMOND BLD
VAD 988170684



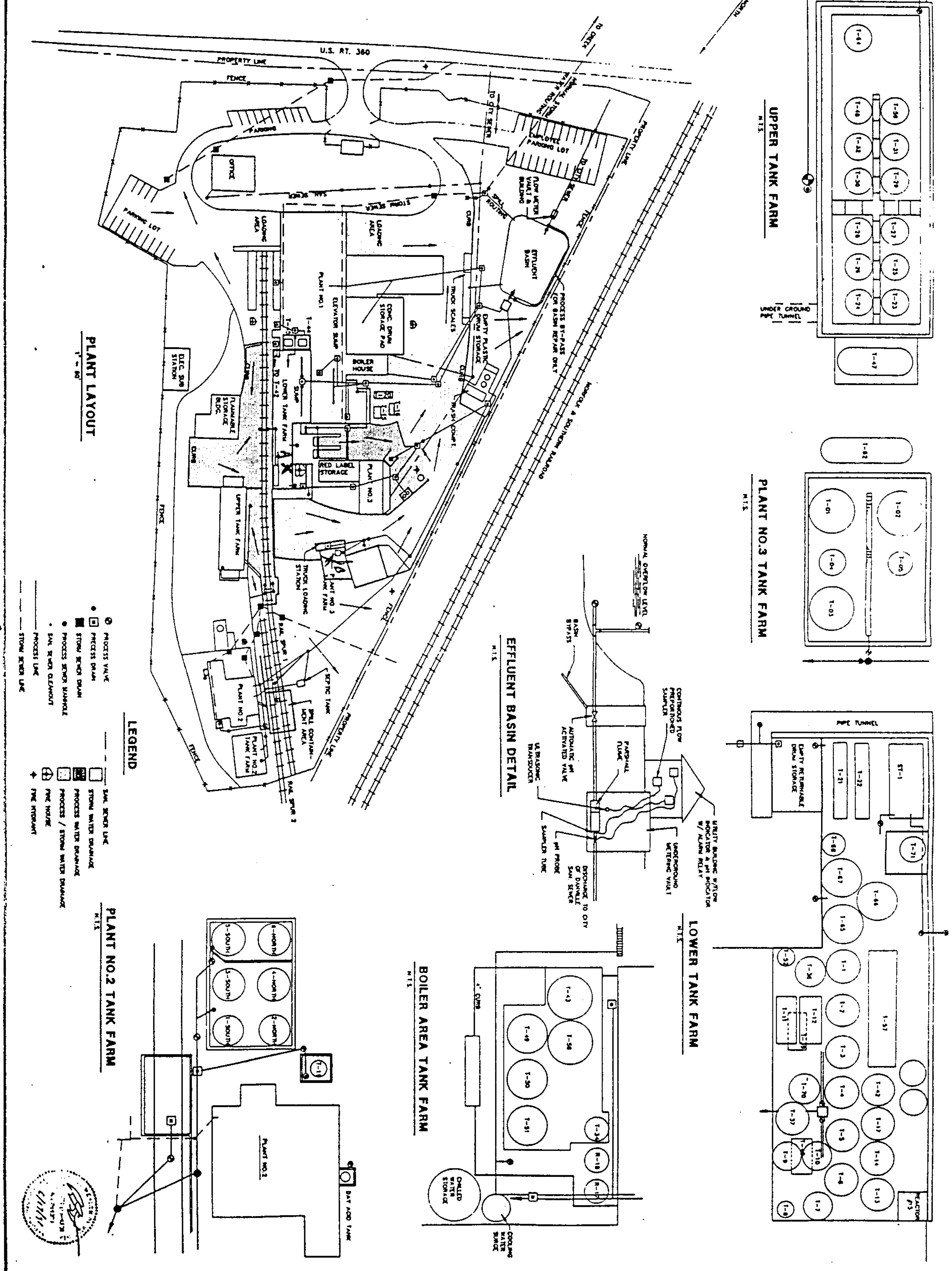
Legend

- ● Fire and/or Foam Hydrants
- ▲ Pull Alarms
- ⬡ 90 DAY ACCUMULATION AREA
- ⊘ satellite accumulation area

100 50 0 100

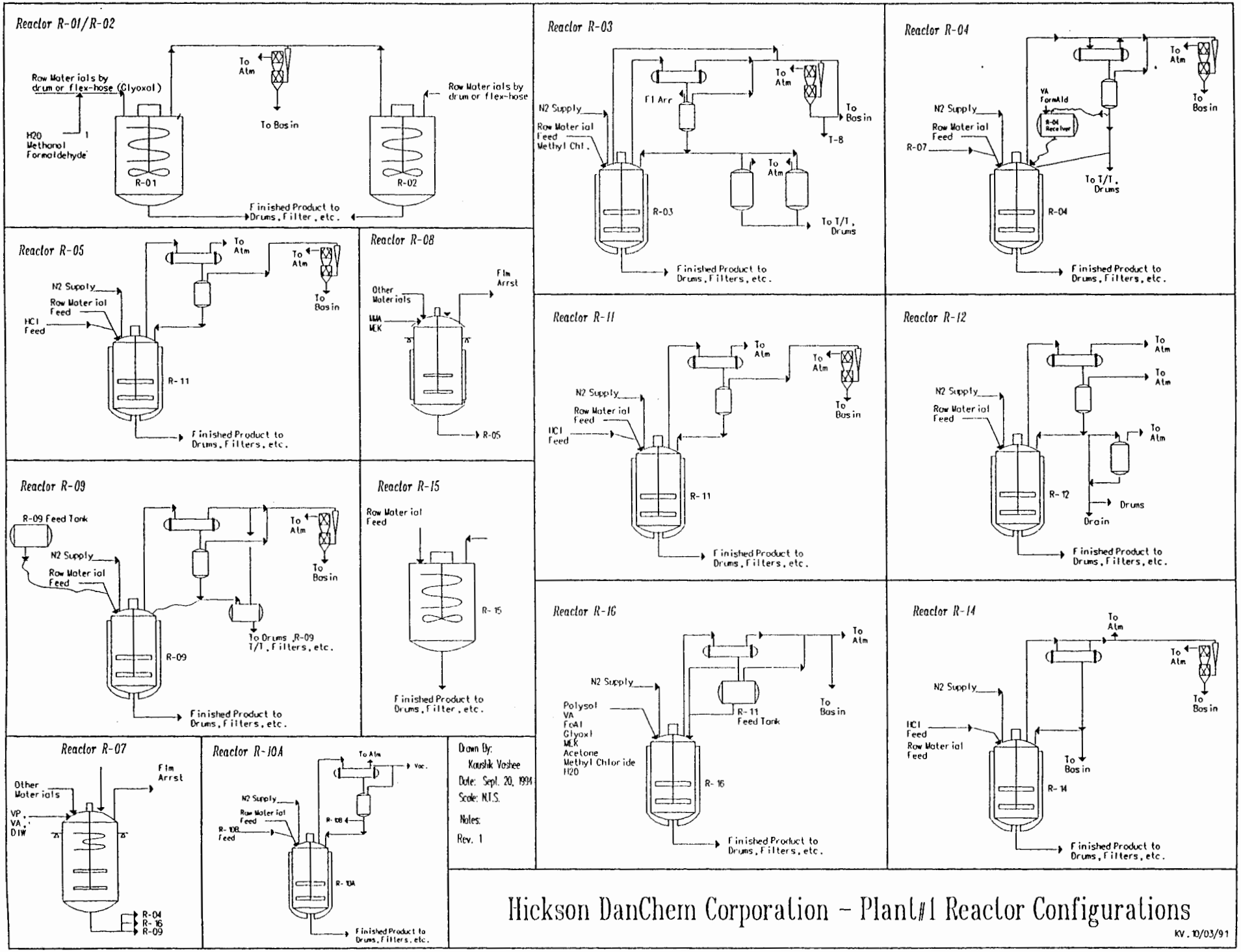
Approximate Scale in Feet

Attachment 2



Spill Containment Plan	Hickson DanChem Corporation Chemical Products Division Danville, Virginia	Dewberry & Davis Architects Engineers Planners Surveyors 551 Piney Forest Road Danville, VA 24541 ☎ (804) 797-4497

Drawn by: J.L.K.
Checked by: D.R.C.
Date: June 1991
Scale: AS NOTED
Sheet: 1 of 1


Reactor R-01/R-02
Raw Materials by drum or flex-hose (Glyoxal)
H20
Methanol
Formaldehyde
To Atm
To Basin
Raw Materials by drum or flex-hose
R-01
R-02
Finished Product to Drums, Filter, etc.
Reactor R-03
N2 Supply
Raw Material Feed
Methyl Chl.
Fl Arr
To Atm
To Basin
T-8
To Atm
To T/T, Drums
R-03
Finished Product to Drums, Filters, etc.
Reactor R-04
To Atm
To Basin
VA
Formald
R-04 Receiver
N2 Supply
Raw Material Feed
R-07
To T/T, Drums
R-04
Finished Product to Drums, Filters, etc.
Reactor R-05
To Atm
To Atm
To Basin
N2 Supply
Raw Material Feed
HCl Feed
R-11
Finished Product to Drums, Filters, etc.
Reactor R-08
Flm Arrst
Other Materials
MEK
R-05
Reactor R-11
To Atm
To Atm
To Basin
N2 Supply
Raw Material Feed
HCl Feed
R-11
Finished Product to Drums, Filters, etc.
Reactor R-12
To Atm
To Atm
To Atm
N2 Supply
Raw Material Feed
R-12
Drums
Drain
Finished Product to Drums, Filters, etc.
Reactor R-09
R-09 Feed Tank
To Atm
To Basin
N2 Supply
Raw Material Feed
To Drums ,R-09 T/T, Filters, etc.
R-09
Finished Product to Drums, Filters, etc.
Reactor R-15
Raw Material Feed
R-15
Finished Product to Drums, Filter, etc.
Reactor R-16
To Atm
To Basin
N2 Supply
Polysol
VA
FoAl
Glyoxl
MEK
Acetone
Methyl Chloride
H20
R-11 Feed Tank
R-16
Finished Product to Drums, Filters, etc.
Reactor R-14
To Atm
To Atm
To Basin
N2 Supply
HCl Feed
Raw Material feed
To Basin
R-14
Finished Product to Drums, Filters, etc.
Reactor R-07
Flm Arrst
Other Materials
VP
VA
DIW
R-04
R-16
R-09
Reactor R-10A
To Atm
Vac.
N2 Supply
Raw Material Feed
R-10B Feed
R-10A
Finished Product to Drums, Filters, etc.
Drawn By:
Kaushik Vashee
Date: Sept. 20, 1994
Scale: N.T.S.
Notes:
Rev. 1
Hickson DanChem Corporation - Plant#1 Reactor Configurations
KV. 10/03/91

January 1994
Revised June 1994

DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF LARGE QUANTITY GENERATORS (LQG)

FACILITY NAME: HICKSON DAN CHEM CORPORATION

EPA ID NUMBER: VAD 988170C84

INSPECTION DATE: 7 AUGUST 1996

NOTE: * means Non-Compliance

VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION		REGULATION	YES	NO	N/A
6.3.	1.	Is a manifest system currently being used for all hazardous waste shipped off site?	X		
6.2.C.	2.	Has the generator determined that the facility has an EPA ID number?	X		
5.5.A.7.	3.	Has the generator determined that the transporter has a valid EPA ID number and a valid Virginia Transporter permit?	X		
6.3. 5.3.B.	4.	Is the following information on the manifest:			
5.3.B.1.		A. The generator's name, mailing address, EPA ID number, and telephone number?	X		
5.3.B.2.		B. A unique five digit number assigned to the manifest by the generator?	X		
5.3.B.3.		C. The total number of pages of the manifest?	X		
5.3.B.4.		D. The company name and EPA ID number of each transporter used?	X	SEE COMMENTS	
5.3.B.5.		E. The company name, site address, and EPA ID number of the facility designated to receive the waste?	X		
5.3.B.6.		F. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	X		
5.3.B.7.		G. The quantities of waste being shipped? and	X		

PART/ SECTION	REGULATION	YES	NO	N/A
5.3.C.	H. The following certification: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment. **OR,** If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.	X		
6.5.C.1.b.	5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago?	X		
6.5.C.1.b.	6. If no, has the generator filed an exception report with the Executive Director?			X
6.5.C.1.b.	7. Does the exception report include:			
6.5.C.1.b.(1)	A. A legible copy of the manifest for which the generator does not have confirmation of the delivery? and			X
6.5.C.1.b.(2)	B. A cover letter explaining the efforts taken to locate the shipment?			X
6.4.E.1.d. 9.1.G.1.	8. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	X		
9.1.G.2.	9. Have new employees to the facility successfully completed training mentioned above within six months of their initial employment or assignment to the facility? 2wk orientation (mandatory!)	X		
9.1.G.3.	10. Do personnel participate in an annual review of the initial training?	X		
9.1.G.4.	11. Does the owner/operator maintain the following documents and records at the facility:			
9.1.G.4.a.	A. Job titles for each position at the facility related to hazardous waste management?		X see comments	*
9.1.G.4.a.	B. The name of the employee filling each job?	X		
9.1.G.4.b.	C. A written job description for each position in 11.A. above?	X		
9.1.G.4.c.	D. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in 11.A. above? and,	X		
9.1.G.4.d.	E. Records that document that the training or job experience required above has been given to, and completed by facility personnel?	X		

PART/ SECTION		REGULATION	YES	NO	N/A
6.4.E.1.d. 9.2.B. 9.2.D.	12.	At the facility, is the following equipment installed:			
9.2.B.1.		A. An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion? audible alarms, bells, sirens	X		
9.2.B.2.		B. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.? phones,	X		
9.2.B.3.		C. Portable fire extinguishers, fire control equipment and decontamination equipment? and	X		
9.2.B.4.		D. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? 2 cooling Towers	X		
9.2.C.	13.	Is the above equipment tested and maintained as necessary to assure proper operation and is a record of the tests and inspections maintained on a log at the facility? alarms monthly/F.E.	X		
9.2.E.	14.	Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies?	X		
6.4.E.1.d. 9.1.F.4.	15.	Does the generator record inspections of the accumulation area at his facility in an inspection log?	X		
9.2.F.1.	16.	Has the facility attempted to arrange agreements with the local authorities such that:			
9.2.F.1.a.		A. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes? LEPC, Fire Dept/Ringgold 1/yr, Danville HAZMAT	X		
9.2.F.1.b.		B. Where more than one police and fire department might respond to an emergency, do agreements specify a primary emergency authority? Ringgold Fire dept	X		
9.2.F.1.c.		C. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? and verbal with Ecology/Four Seasons	X		
9.2.F.1.d.		D. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases?	X		
6.4.E.1.d. 9.3.A.1.	17.	Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water? dated JULY 1996	X	See comments	

PART/ SECTION		REGULATION	YES	NO	N/A
9.3.B.	18.	Does the contingency plan contain the following elements:			
9.3.B.(1,2)		A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water?	X		
9.3.B.3.		B. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required?	X		
9.3.B.4.		C. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator. **NAME:** DAVID CLARK **TITLE:** Director of manufacturing **PHONE:** **Home** 804-799-8665 **Office** 804-797-8120 ext. 130	X		
9.3.B.5.		D. 1. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility?	X		
9.3.B.5.		2. Does this list of emergency equipment specify the location and physical description of each item on the list and a brief outline of its capabilities?	X		
9.3.B.6.		E. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? and		X	See comments
9.3.C.2.		F. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? *** **PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".**	X	see comments	
9.3.F.	19.	Has the contingency plan ever been implemented?	X	see comments	
9.3.F.(9,10)	20.	If yes, was a written report filed with the Director within 15 days and were the Director and other required authorities properly notified before operations resumed?			
6.5.A.1., 2., & 3.	21.	Does the generator retain copies of all manifests, annual reports, exception reports, test results, and waste analysis for at least three years?	X		
6.5.B.1.	22.	Has the facility submitted an annual report for the preceding calendar year by March 1? submitted 2/29/96	X		
6.4.E.7.	23.	Does the generator who manages HW prohibited under Part XV treat waste in tanks and containers? If yes, must meet requirements of 6.4.E. and 15.1.G.1.d.		X	
15.1.G.1.d.	24.	If the generator treats waste in tanks or containers, has the generator developed a written waste analysis plan and kept on-site in the generator's records. Has the generator filed a plan with director at least 30 days prior to treatment.			X

PART/ SECTION		REGULATION	YES	NO	N/A
6.5.D.	25.	Has the generator ever submitted a release report if responsible for release of HW which threatens public health. (Must notify NRC, local Government, the Department.)	X	see comments	
6.4.E.2.	26.	Does the generator accumulate (store) hazardous waste in containers or tanks on-site for greater than 90 days? If yes, interim status or a TSD permit is required. (Up to a 30 day extension may be granted by the Director.)		X	
6.4.E.1.e.	27.	Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing container and tank accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas?	X		
6.4.E.1.a.(1) 9.8.	28.	The Use and Management of Containers for 90 Day Accumulation Areas:			
6.4.E.1.a 9.8.B.	29.	Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? If **No**, list the accumulation areas where there are problems and the type of problems. *** **PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".**	X		
6.4.E.1.a. 9.8.C.	30.	Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?	X		
6.4.E.1.b.	31.	Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?	X		
6.4.E.1.c.	32.	Is the container labeled or marked clearly with the words "Hazardous Waste".	X		
9.8.D.1.	33.	Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? If **No**, list the locations where open containers are found. *** **PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS."**	X		
9.8.E.	34.	Are the areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?	X		
9.8.F.	35.	Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line?	X		
9.8.G.1.	36.	Are incompatible wastes placed in separate containers?	X		
9.8.G.3.	37.	Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?	X		
6.4.E.3.a.	38.	Does the generator have satellite accumulation areas where up to 55 gal of any one type of HW (1 QT acutely HW) are accumulated? If yes,	X		
6.4.E.3.a.		A. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	X		

PART/ SECTION		REGULATION	YES	NO	N/A
6.4.E.3.a.(1) 9.8.B.		B. Are the containers in good condition?	X		
6.4.E.3.a.(1) 9.8.C.		C. Are the containers compatible with the waste?	X		
6.4.E.3.a.(1) 9.8.D.1.		D. Are the containers kept closed except as necessary to add or remove waste?	X		
6.4.E.3.a.(2)		E. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container? and	X		
6.4.E.3.b.		F. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,		X	
6.4.E.3.b.		1) Has the generator marked the excess amount with the date the excess amount began accumulating?			X
6.4.E.3.b.		2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas? Namely, has he notified the Executive Director about the location of the accumulation area?			X
	39.	**PLEASE LIST ANY NEWLY REGULATED WASTE THAT IS NOT LAND RESTRICTED (such as D018-D043, F032, F034 or F035) ON THE LAST PAGE UNDER "COMMENTS".**			
15.1.A.2.	40.	Does the facility generate, transport, treat, store or dispose any land-restricted wastes? (See VHWMR Part 15) ***	X		
15.1.A.3.	41.	Is land disposal of wastes occurring? If yes,		X	
15.1.A.3.a.		A. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? **OR**			X
15.1.A.3.b.		B. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? **OR**			X
15.1.A.3.c.		C. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X
15.1.E.	42.	Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?			X
15.1.F.	43.	Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?		X	X

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.C.1.	44. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X	
15.1.D.1.	45. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X	
	46. If yes, does the facility meet the following requirements:			
15.1.D.1.b. 15.1.G. 15.3.C. 15.4. 15.3.	A. Are the residues of the treatment analyzed as specified in VHWMR § 15.1.G. or § 15.3.C. to determine if they meet the applicable treatment standards or VHWMR § 15.4. or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR § 15.3?			X
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	B. Has the owner/operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liner?			X
15.1.D.1.c. 10.5.	C. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR § 10.5?			X
15.1.D.1.d.	D. Has the owner/operator submitted a written certification to the Executive Director that the requirements of 15.1.D.1.c. have been met which states: "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." and			X
15.1.D.1.d.	E. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?			X
15.1.G.1.a.	47. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	X		
	48. Did the notification include the following information:			
15.1.G.1. a.(1)	A. EPA Hazardous Waste Number?	X		
15.1.G.1. a.(2)	B. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR § 15.3.C.?	X		
15.1.G.1. a.(3)	C. The manifest number associated with the shipment of waste? and	X		

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1. a.(4)	D. Waste analysis data, where available?	X		
15.1.G. 1.b.	49. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR § 15.3.C.?			X
	50. Did the notification include the following information:			
15.1.G.1. b.(1)(a)	A. EPA Hazardous Waste Number?			X
15.1.G.1. b.(1)(b)	B. The corresponding treatment standards and all applicable prohibitions?			X
15.1.G.1. b.(1)(c)	C. The manifest number associated with the shipment of waste? and			X
15.1.G.1. b.(1)(d)	D. Waste analysis date, where available?			X
15.1.G.1. b.2.	51. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR § 15.4. and all applicable prohibitions set forth in VHWMR § 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X
15.1.G.1.c.	52. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?		X	
15.1.G.1.g.	53. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	X		
15.5.	54. Is the generator storing land restricted waste? (For one year storage only)		X	
15.5.1.a.	55. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X

Comments:

#4D: Few manifest errors were discovered during inspection surrounding transporters. One manifest had no Transporter signature + date, one had no EPA ID #, one transporter did not date. Corrected during inspection by obtaining ID# and noting deficiencies on manifest. A more thorough review will be done on outgoing manifests.

#11A: job descriptions currently own generic "Waste Handling". More detailed descriptions are required relating directly to tasks associated to HW Handling.

#18: If any major flammable solvent spill, flow/material could be managed in 40,000 gal equalization tank to prevent contamin of effluent basin. Waste captured in equal. Tank would be analyzed/declared + disposed of properly.

Concrete Spill Capture Tanks

#17: Contingency Plan integrated with Pollution Prevention Plans (SWPP + SPCCP)

#18E: Evacuation procedure is not included within the SWPP + SPCC plans (also HW cont. plan) Note in Appendix A says to see internal Emergency Response Plan. This was not reviewed by this inspector during the inspection.

#18F: Plan sent to list below. However, documentation of receipt should be maintained (i.e. certified mail receipts, cover letter)

- Danville Fire Dept, Police Dept, Life Saving Crew
- Danville Memorial Hospital
- Ringgold Fire Dept
- Danville HAZ MAT
- Pittsylvania County Sheriff
- VA Dept Environmental Quality

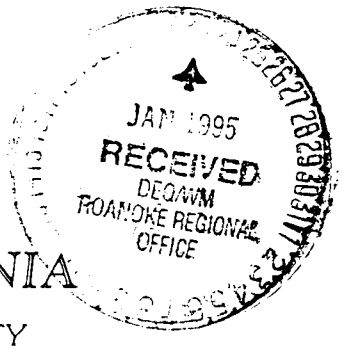
#19:

20 April '96 product release / containers above temp. Thermally decomposed.
- Not Hazardous Waste release (was product Tret Butyl Oxynaocianate)
- Danville F.D. HAZ MAT Team responded + handled w/Ringgold FD

14 April '95 Styrene Monomer release (D001) of 1.493 lbs (RQ is 1000 lbs)
- Notified Nat'l Response Center (NRC) # 287486
- Notified Danville POTW, Dept Environ Quality (2.029 lbs styrene to POTW)

13 March '95 Product valve left open (48% of product is styrene monomer)
product drums release of N-Butyl Acrylate, Acrylic Acid, Styrene Oxide and Phenothiazine
- 21 Agencies involved (DEQ, DES, City Danville, Ringgold FD, etc)
- NO NRC. Was evacuation + Press release. Approx 8-10 people to hospital
- incident initiated in House incident review

ORIGINAL



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Peter W. Schmidt
Director

P.O. Box 10009
Richmond, Virginia 23240-0009
(804) 762-4000

January 18, 1995

Mr. Keith G. Kline
HS&E Coordinator
Hickson DanChem Corporation
P.O. Box 400, 1975 Richmond Blvd.
Danville, Virginia 24543

RE: Hickson DanChem (VAD988170684), Danville, Virginia - Regulatory Interpretation

Dear Mr. Kline:

On January 12, 1995, Dr. Wladimir Gulevich and Ms. Lisa Ellis met with you and representatives of Hickson DanChem to discuss the regulatory status of a waste stream generated at your company.

According to information provided during this meeting, Hickson DanChem uses toluene in a manufacturing process which produces a polymer adhesive as its product. The product is produced in a batch reaction in a reactor vessel in which the toluene acts as a carrier for the product (i.e., it is used for its solvent properties). The toluene is recycled for approximately 5-6 batches. After the 6th batch, the Food & Drug Administration's purity requirements for the solvent and product are exceeded. The toluene, at this point, is pumped out of the reactor and drummed as F005 hazardous waste. The reactor is then cleaned out with water, and the washwater is subsequently pumped out and drummed. This washwater contains approximately 500 ppm toluene from the residuals in the tank which Hickson DanChem has historically managed as F005, also.

During the meeting, you provided a copy of an EPA Headquarters letter dated October 26, 1987. In this letter, International Flavors and Fragrances, Inc. is advised by EPA Headquarters that "solvent-contaminated washwater is not within the scope of the hazardous waste F003 listing for spent non-halogenated solvent. The subject waste stream is generated from the washout of a reactor vessel containing residues of solvent...Therefore, the waste is not a spent solvent, but a process wastewater contaminated with solvent constituents. This waste is very different from a solvent stream that has been used and as a result of contamination can no longer be used as a solvent without further processing. It is not the Agency's intent to regulate water from washout of a reactor vessel as F003."

Ms. Ellis contacted Mr. Ron Josephson of EPA Headquarters' Waste Identification Branch. Mr. Josephson indicated that EPA's position on the issue of washwater contaminated with solvent is still the same, and that EPA does not intend to regulate the residues of solvents in reactor vessels as listed hazardous waste provided that the bulk of the solvent is managed properly as listed hazardous waste. He provided additional letters and memos issued by EPA Headquarters on this issue. In a memo dated December 20, 1990, from Mr. Robert Duprey to Ms. Sylvia Lowrance, it is stated that "the Agency does not consider small amounts of solvent carried over on the metal parts from solvent degreasing to meet the listing definition of a spent solvent. Therefore, if any solvent were carried over into the caustic rinse water, the mixture rule would not be applicable." An EPA memo dated August 30, 1991, from Ms. Sylvia Lowrance to Mr. Robert Duprey states that "If solvents are used for cleaning in excess of amounts needed for that purpose, however, the excess solvent residues could be spent, and therefore listed hazardous waste. No set quantity has been established for excess amounts of solvents which would cause the residual in question to be subject to regulation. The nature of facility operations will dictate whether the amount of solvent released...would cause the waste in question to meet the listing description. The applicability of such an interpretation would depend on the nature of the operation, the quantities of solvents used and disposed in the operation, and the manner in which they are used/disposed."

Based upon the correspondence from EPA Headquarters, and in light of the nature of waste generation and management at Hickson DanChem, it has been concluded by VDEQ that the waste stream generated at Hickson DanChem from the washing out of process residuals from the reactor vessel does not meet the intent of the F005 hazardous waste listing. Therefore, provided that this waste stream does not exhibit a characteristic of hazardous waste (i.e., Ignitability, Corrosivity, Reactivity, or Toxicity), the waste stream will not be regulated as a hazardous waste. Please note, however, that this interpretation is based upon the assumption that the waste toluene is removed from the tank and managed as F005 hazardous waste, and that the only toluene remaining in the tank prior to the washout are residuals that could not be removed.

If you have any questions, please contact Ms. Ellis of my staff at (804) 527-5272.

Sincerely,

Hassan Vakili

Hassan Vakili
Director
Waste Operations

cc: Lisa Ellis, VDEQ
Wladimir Gulevich, VDEQ
Mohammad Habibi, VDEQ
Steve Wright, VDEQ Roanoke Regional Office
Hazardous Waste Central Files

MARCH 1991

CHECKLIST FOR RCRA INSPECTION OF RECYCLABLE MATERIALS (USED OIL, HAZARDOUS WASTE FUEL, AND PRECIOUS METALS)

Name of Facility: Hickson DanChem. Corporation

Address: P.O. Box 400 1975 Richmond Blvd.
Danville, VA. 24543

EPA ID Number: VAD988170684

Facility Representative: Stephen J. Jelich

Title: Vice President, Operations

Telephone Number: (804) 797-8110

Inspector Name: Ken Morris / Steve Frazier

Title: Chemist / Chemist

Date of Inspection: 1/23/92

VHWMR Ref.

13.3.A.1. 1. Does the facility (generate) transport, market or recycle hazardous wastes that are burned for energy recovery (hazardous waste fuel) in any boiler or industrial furnace that is not regulated as an incinerator? (YES) NO
Identify: See Attachment 1 all waste streams

13.4.A.1 2. Does the facility (generate) market or recycle used oil that is ~~burned~~ for energy recovery (used oil fuel) in any boiler or industrial furnace that is not regulated as an incinerator except used oil mixed with hazardous wastes? (YES) NO
Identify: Lubricating oil from machines

(Note: Used oil burned for energy recovery is regulated as used oil fuel rather than hazardous waste fuel if it is a hazardous waste solely because it exhibits a characteristic of hazardous waste and is not mixed with a hazardous waste, or if it

contains hazardous waste generated by a conditionally exempt SQG, or if it exceeds the following maximum levels of hazardous constituents (off-specification used oil fuel):

Arsenic	5 ppm
Cadmium	2 ppm
Chromium	10 ppm
Lead	100 ppm
Flash point	100 F minimum
Total Halogens	4000 ppm *

* Used oil which contains greater than 1000 ppm total halogens is assumed to contain halogenated hazardous waste and therefore be regulated as hazardous waste fuel unless the company has shown that the used oil does not contain hazardous waste. For those wastes shown not to contain hazardous waste, the maximum allowable total halogen level is 4000 ppm.)

13.5.A
13.5.B

3. Does the facility generate, transport or store recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? YES (NO)

13.6.B.

4. Does the facility store spent batteries before reclaiming them? [Note: Persons who generate, transport, or collect spent batteries, or who store spent batteries but don not reclaim them are not subject to VHWMR Parts IV through XIII.] YES (NO)

For facilities who answered "Yes" to question 1, complete questions 5 through 10:

5. Does the facility:

(a) generate b) transport c) market d) burn

hazardous waste fuel? (circle one)

[Note: If facility is a transporter, complete transporter checklist.]

6. For marketers of hazardous waste fuel: N/A

a. For marketers who make the claim that the waste is legitimate hazardous waste fuel, how is this done? _____

_____

Identify each waste stream (if more than one stream is mixed together, identify each stream separately): _____

_____

_____

BTU value of each stream: _____

_____

_____

7. For marketers of hazardous waste fuel:

13.3.B.1.a 13.3.E.2	**a.** Does the person market hazardous waste fuel only to those persons who have completed a Notification of Hazardous Waste Activity and received an EPA Identification Number, and who burn the fuel in boilers or industrial furnaces as defined in VHWMR Part I?	YES	NO	N/A
13.3.E.3.	**b.** Are the provisions of VHWMR Sections 6.4.E, 9. through 9.11., 10. through 10.11. and Part XI being adhered to?	YES	NO	
13.3.E.5.a	**c.** For marketers who ship hazardous waste fuel to a burner or another marketer, has the marketer first obtained a one time written and signed notice from the burner or marketer certifying that the burner or marketer has completed a Notification of Hazardous Waste Activity, and if the recipient is a burner, that the hazardous waste fuel will be burned in a boiler or industrial furnace only as defined in VHWMR Part I?	YES	NO	
13.3.E.5.b	**d.** For marketers who accept shipments of hazardous waste fuel from other marketers, has the accepter submitted the appropriate certification identified in c above?	YES	NO	
13.3.E.6.	**e.** In addition to any applicable generator or storer recordkeeping requirements, does the marketer keep	YES	NO	N/A

		copies of all certification notices he receives or sends for at least three years from the date of his last transaction with the person to whom the certification was made?			
13.3.B.2	8.	For burners (recyclers):	YES	NO	N/A
		a. Is the hazardous waste fuel burned only in an industrial furnace, industrial boiler or utility boiler as defined in VHWMR Part I? Identify: _____ _____			
13.3.F.2		**b.** Has the burner filed the appropriate Notification of Hazardous Waste Activity for his burning activities and received an EPA Identification Number?	YES	NO	
13.3.F.3.a		**c.** For short term accumulation by generators who burn their hazardous waste fuel on site, are the applicable accumulation provisions of VHWMR Section 6.4.E. being met (see generator checklist)?	YES	NO	
13.3.F.3.b 13.3.F.3.c		**d.** For existing or new storage facilities who burn their hazardous waste fuel on site, are the applicable storage provisions of VHWMR Sections 9. through 9.11. or 10. through 10.11. respectively being met?	YES	NO	
13.3.F.4		**e.** Before the burner accepts his first shipment of hazardous waste fuel from a marketer, has he provided the marketer with a one-time written and signed notice certifying that he has completed a Notification of Hazardous Waste Activity and obtained an EPA Identification Number, and that he will burn the hazardous waste fuel only in a boiler or industrial furnace?	YES	NO	
13.3.F.5.		**f.** In addition to any applicable generator or storer recordkeeping requirements, does the burner keep copies of all certification notices he sends for at least three years from the	YES	NO	N/A

date of his last transaction with the person to whom the certification was made?

13.3.C. **9. For generators of hazardous waste fuel:** generators of hazardous waste fuel are subject to VHWMR Parts V and VI. Complete Generator Checklist.

10. If the generator makes the claim that this is legitimate hazardous waste fuel, how is this done? Ecoflo - fuels blending program

Identify Waste: See Attachment 1

BTU value: * 130,176 BTU/Gallon
115,191 BTU/gallon

For facilities who answered "Yes" to question 2, complete questions 11 through 14:

11. Does the facility:

(a) generate b) market c) burn

used oil burned for energy recovery? (circle one)

12. Has the inspector determined that the used oil is not mixed with hazardous waste? If not, do so.

13.4.A.2. Has the generator mixed hazardous waste with his used oil? * = gear oil (YES) (NO) *

If yes, explain: In process some toluene is mixed with the oil. This is shipped as a hazardous waste

(Complete the hazardous waste fuel section of the checklist if the used oil is burned for energy recovery.)

13.4.B.1.a **13.** For marketers of used oil fuel: N/A

* = will send information

	a. Does the person market used oil fuel only to burners or other marketers who have completed a Notification of Hazardous Waste Activity and received an EPA Identification Number, and who burn the fuel in boilers, industrial furnaces or used oil-fired space heaters as defined in VHWMR Part I?	YES	NO	N/A
13.4.D.2.e	**b.** For marketers who ship used oil fuel to a burner or another marketer, has the marketer first obtained a one time written and signed notice from the burner or marketer certifying that the burner or marketer has completed a Notification of Hazardous Waste Activity, and if the recipient is a burner, that the used oil fuel will be burned in a boiler or industrial furnace only?	YES	NO	
13.4.D.2.e	**c.** For marketers who accept shipments of used oil fuel from other marketers, has the accepter submitted the appropriate certification identified in c above?	YES	NO	
13.4.D.2.f	**d.** In addition to any applicable generator or storer recordkeeping requirements, does the marketer keep copies of all certification notices he receives or sends for at least three years from the date of his last transaction with the person to whom the certification was made?	YES	NO	
13.4.D.2.a	**e.** Has the marketer obtained analyses or other information documenting that the used oil fuel does not exceed the maximum levels allowed in question 2?	YES	NO	
13.4.D.2.c	**f.** Has the marketer completed a Notification of Hazardous Waste Activity and obtained an EPA Identification Number?	YES	NO	
13.4.D.2.d	**g.** For each shipment of off-specification used oil to be burned for energy recovery initiated by the marketer, has the marketer prepared and sent an invoice to the receiving facility?	YES	NO	N/A

If yes, did the invoice contain the following information?

1. An invoice number;	YES	NO
2. His own EPA Identification number and the identification number of the receiving facility?	YES	NO
3. The names and addresses of the shipping and receiving facilities?	YES	NO
4. The quantity of off-specification used oil to be delivered?	YES	NO
5. The date of shipment or delivery?	YES	NO
6. The following statement; "This used oil is subject to EPA regulation under 40 CFR Part 266."?	YES	NO

13.4.D.2.f **h.** Does the marketer keep copies of the following records for at least three years:

1. Copies of analysis for used oil which he claims meets specifications?	YES	NO
2. An operating log containing the following information for each shipment of used oil fuel that meets specification: Name and address of the receiving facility; the quantity of used oil fuel delivered; date of shipment or delivery; and a cross-reference to the record of used oil analysis?	YES	NO
3. For each shipment of off-specification used oil fuel initiated, a copy of each invoice?	YES	NO

14. For burners (recyclers) of used oil fuel:

13.4.E.2 **a.** Has the burner filed the appropriate Notification of Hazardous Waste Activity for his burning YES NO

activities and received an EPA Identification Number?

13.4.E.3 **b.** Prior to accepting the first shipment of off-specification used oil fuel from a marketer, did the burner provide each marketer with a one-time written and signed notice certifying that he has completed a Notification of Hazardous Waste Activity and received an EPA ID Number, and that he will burn used oil only in an industrial furnace or boiler? YES NO N/A

13.4.E.5. **c.** Has the burner kept a copy of each of the following for at least three years:

1. Each invoice he has received? YES NO

2. Copies of each analysis of used oil fuel? YES NO

3. A copy of each certification notice that he sends to a marketer? YES NO

For facilities who answered "Yes" to question 3, complete questions 15 through 16:

13.5.B.1. **15.** Have persons who generate, transport or store recyclable materials used for precious metal recovery met the following requirements:

13.5.B.1.a **a.** Notification requirements of VHWMR Part IV? YES NO

13.5.B.1.a **b.** Manifest requirements of VHWMR Part V? YES NO

c. Has the storer of recyclable materials verified that the transporter has a valid Virginia hazardous waste transporter permit? YES NO

13.5.B.1.b **d.** For transporters, obtained a transporter permit in accordance with VHWMR Section 7.3, and used a manifest system in accordance with VHWMR Section 7.5? YES NO N/A

13.5.B.1.b **e.** For storers, have they followed the appropriate manifesting and recordkeeping requirements of VHWMR Section 9.4? YES NO N/A

13.5.B.2 **16.** For persons who store recyclable materials, have the following records been kept to document that they are not accumulating these materials speculatively:

a. Records showing the volume of these materials stored at the beginning of the calendar year; and YES NO

b. The amount of these materials generated or received during the calendar year; and YES NO

c. The amount of materials remaining at the end of the calendar year? YES NO

d. Has the storer turned over at least 75% of his stored recyclable materials in the preceding calendar year? YES NO

For facilities who answered "Yes" to number 4:

13.6.B. **17.** For facilities who store spent lead-acid batteries before reclaiming them:

13.6.B.1. a. Has the facility filed a Notification YES NO

13.6.B.3. b. Has the facility complied with the appropriate sections of VHWMR Part X (except 10.1.C., 10.4.A., and 10.4.E.)? YES NO

13.6.B.4. c. Has the facility complied with all applicable provisions of VHWMR Parts XI and XII? YES NO N/A

18. Comments:_____

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_____

November 1991

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF LAND-RESTRICTED WASTE MANAGEMENT

Name of Facility: Hickson DanChem. Corporation

Address: P.O. Box 400 1975 Richmond Blvd.
Danville, VA. 24543

EPA ID Number: VAD988170684

Facility Representative: Stephen J. Jelich

Title: Vice President, Operations

Telephone Number: (804) 797-8110

Inspector's Name: Ken Morris / Steve Frazier

Title: Chemist / Chemist

Date of Inspection: 1/23/92

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	1. Does the facility (generate), transport, or treat, store or dispose any ~~land-~~restricted wastes? (See Attachment) If yes, please list: * See Attachment 1 for list.	(YES) NO
15.1.A.3.	**2.** Is land disposal of wastes listed in 1 above occurring? If yes, then:	YES (NO)
15.1.A.3.a.	**a.** Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? (See effective dates listed in Attachment)	YES NO
15.1.A.3.b.	**b.** Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition?	YES NO

15.1.A.3.c.	**c.** Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste, per month?	YES	NO
15.1.E.	**d.** Has the owner/operator submitted an application for a case-by-case extension to the effective date of any applicable restriction?	YES	NO
15.1.F.	**e.** Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?	YES	NO
15.1.C.	**3.** Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?	YES	(NO)
15.1.D.1.	**4.** Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (If no, go to number 6) [If yes, complete surface impoundment checklist]	YES	(NO)
	[Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.]		
	If yes, does the facility meet the following requirements:		
15.1.D.1.b 15.1.G. 15.3.C. 15.4. 15.3.	**a.** Are the residues of the treatment analyzed as specified in VHWMR Sections 15.1.G.or 15.3.C. to determine if they meet the applicable treatment standards or VHWMR Section 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR Section 15.3?	YES	NO
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	**b.** Has the owner or operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?	YES	NO
15.1.D.1.c. 10.5.	**c.** Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR Section 10.5.?	YES	NO

15.1.D.1.d. **d.** Has the owner or operator submitted a written certification to the Executive Director that items a-c have been met which states, YES NO

"I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."?

15.1.D.1.d. **e.** Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification? YES NO

15.1.G.1. **5.** Has the owner/operator determined if his waste is a land restricted waste? (YES) NO

15.1.G.1a. **6.** For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied **each** shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions? (YES) NO

Did the notification include the following information:

15.1.G.1.b.1a - EPA Hazardous Waste Number; (YES) NO

15.1.G.1.b.1b - The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.C; (YES) NO

15.1.G.1.b.1c - The manifest number associated with the shipment of waste; (YES) NO

15.1.G.1.b.1d - Waste analysis data, where available? (YES) NO

15.1.G.1.b. **7.** For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied **each** shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR Section 15.3.C? (YES) NO

a. Did the notification contain the following information:

15.1.G.1.b.1a	- EPA Hazardous Waste Number;	(YES)	NO
15.1.G.1.b.1b	- The corresponding treatment standards and all applicable prohibitions;	(YES)	NO
15.1.G.1.b.1c	- The manifest number associated with the shipment of waste; and	(YES)	NO
15.1.G.1.b.1d	- Waste analysis data, where available?	(YES)	NO
15.1.G.1.b.2.	**b.** Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR Section 15.4. and all applicable prohibitions set forth in VHWMR Section 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."	(YES)	NO
15.1.G.1.c.	**8.** For restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?	YES	NO
15.1.G.f.	**9.** Does the generator retain on-site copies of all notices, certification, demonstrations, waste analysis dat, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	(YES)	NO
15.1.G.2.	**10.** <u>For Treatment Facilities ONLY</u>: Has the owner or operator of the treatment facility tested the treatment residues or extract to assure that they shall meet the applicable treatment standards?	YES	NO
15.1.G.2.	**a.** Has this testing been done at the frequency stated in the waste analysis plan?	YES	NO

15.1.G.2.a.
15.1.G.1.a.

b. For treatment residuals which do not meet the applicable treatment standards, has the facility filed the notification in 8 above as a generator to any subsequent treatment facilities? YES NO

15.1.G.2.b.

c. For treated wastes meeting the applicable treatment standards, or for wastes not subject to any treatment standards, has a certification been signed and accompanies each shipment stating: YES NO

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in VHWMR Sections 15.4 and 15.3.C. without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

OR (for wastes with treatment standards expressed as technologies)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of VHWMR Section 15.4.C. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

15.5.

11. Is the generator storing land restricted waste? (For one year storage only) YES NO

15.5.1.a.

a. If yes, is the storage onsite solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facility proper recovery, treatment or disposal? YES NO

Attachment - Land Restricted Wastes

Waste	Effective Date
F001 - F005	11/08/86
F001 - F005 from Small Quantity Generators, generated via RCRA corrective actions or CERCLA response actions, and hazardous wastes containing less than 1% total solvent constituents	11/08/88
F001 - F005 soil and debris resulting from RCRA corrective actions or CERCLA response actions	11/08/90

California Listed Wastes

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations greater than or equal to 1,000 ppm (mg/l). 7/8/87

Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing any of the following metals or compounds of these metals at concentrations greter than or equal to those specified below:

Arsenic (as As)	500 mg/l
Cadmium (as Cd)	100 mg/l
Chromium (as Cr VI)	500 mg/l
Lead (as Pb)	500 mg/l
Mercury (as Hg)	20 mg/l
Nickel (as Ni)	134 mg/l
Selenium (as Se)	100 mg/l
Thallium (as Tl)	130 mg/l

Liquid hazardous wastes having a pH less than or equal to 2.0. 7/8/87

Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. 7/8/87

Liquid hazardous wastes, primarily water, containing greater than or equal to 1000 mg/l HOCs, but less than or equal to 10,000 mg/l HOCs. 7/8/87

California waste contaminated soil and debris resulting from RCRA corrective actions or CERCLA response actions. 11/8/90

Liquid hazardous wastes, not primarily water, containing greater than or equal to 1000 mg/l HOCs. 11/8/88

Nonliquid (non-RCRA/CERCLA) hazardous wastes containing greater than or equal to 1000 mg/l HOCs. 11/8/88

Effective Dates of Land Disposal Restricted Wastes

Waste Code	Waste Category	Effective Date
D001	All	Aug. 8, 1990
D002	All	Aug. 8, 1990
D003	All	Aug. 8, 1990
D004	Inorganic Solid Debris	May 8, 1992
D004	Nonwastewater	May 8, 1992
D004	Wastewater	Aug. 8, 1990
D005	Inorganic solid debris	May 8, 1992
D005	All others	Aug. 8, 1990
D006	Inorganic solid debris	May 8, 1992
D006	All others	Aug. 8, 1990
D007	Inorganic solid debris	May 8, 1992
D007	All others	Aug. 8, 1990
D008	Inorganic solid debris	May 8, 1992
D008	Lead acid batteries	May 8, 1992
D008	All others	Aug. 8, 1990
D009	Inorganic solid debris	May 8, 1992
D009	High mercury nonwastewater	May 8, 1992
D009	Low mercury nonwastewater	May 8, 1992
D009	All others	Aug. 8, 1990
D010	Inorganic solid debris	May 8, 1992
D010	All others	Aug. 8, 1990
D011	Inorganic solid debris	May 8, 1992
D011	All others	Aug. 8, 1990
D012	All	Aug. 8, 1990
D013	All	Aug. 8, 1990
D014	All	Aug. 8, 1990
D015	All	Aug. 8, 1990
D016	All	Aug. 8, 1990
D017	All	Aug. 8, 1990
F002	All	Aug. 8, 1990
F005	All	Aug. 8, 1990
F006	Wastewater	Aug. 8, 1990
F006	Nonwastewater	Aug. 8, 1988
F006 (cyan.)	Nonwastewater	July 8, 1989
F007	All	July 8, 1989
F008	All	July 8, 1989
F009	All	July 8, 1989
F010	Soil & debris	June 8, 1991
F010	All others	June 8, 1989
F011	All	July 8, 1989
F012	All	July 8, 1989
F019	All	Aug. 8, 1990
F020	Soil & debris	Nov. 8, 1990
F020	All others	Nov. 8, 1988
F021	Soil & debris	Nov. 8, 1990
F021	All others	Nov. 8, 1988
F022	Soil & debris	Nov. 8, 1990
F022	All others	Nov. 8, 1988
F023	Soil & debris	Nov. 8, 1990
F023	All others	Nov. 8, 1988
F024	Soil & debris	June 8, 1991
F024 metals	Nonwastewater	Aug. 8, 1990
F024 dioxins/ furans	All	Aug. 8, 1990
F024	All others	June 8, 1989
F025	All	Aug. 8, 1990
F026	Soil & debris	Nov. 8, 1990
F026	All others	Nov. 8. 1988
F027	Soil and debris	Nov. 8, 1990
F027	All others	Nov. 8, 1988
F028	Soil and debris	Nov. 8, 1990
F028	All others	Nov. 8, 1988
F039	Wastewater	Aug. 8, 1990
F039	Nonwastewater	May 8, 1992
K001	Soil & debris	Aug. 8, 1988
K001 lead/ organics	All	Aug. 8, 1990
K001	All others	Aug. 8, 1990
K002	All	Aug. 8, 1990
K003	All	Aug. 8, 1990
K004	All	Aug. 8, 1990

K005	All	Aug. 8, 1990
K006	All	Aug. 8, 1990
K007	All	Aug. 8, 1990
K008	All	Aug. 8, 1990
K009	Soil & debris	June 8, 1991
K009	All others	June 8, 1989
K010	Soil & debris	June 8, 1991
K010	All others	June 8, 1989
K011	Wastewater	Aug. 8, 1990
K011	Nonwastewater	June 8, 1989
K011	Soil & debrsi	June 8, 1991
K013	Wastewater	Aug. 8, 1990
K013	Nonwastewater	June 8, 1989
K013	Soil & debris	June 8, 1991
K014	Wastewater	Aug. 8, 1990
K014	Nonwastewater	June 8, 1989
K014	Soil & debris	June 8, 1991
K015	Wastewater	Aug. 8, 1988
K015	Nonwastewater	Aug. 8, 1990
K016	Soil & debris	Aug. 8, 1990
K017	All others	Aug. 8, 1990
K018	Soil & debris	Aug. 8, 1990
K018	All others	Aug. 8, 1988
K019	Soil & debris	Aug. 8, 1990
K019	All others	Aug. 8, 1988
K020	Soil & debris	Aug. 8, 1990
K020	All others	Aug. 8, 1988
K021	All	Aug. 8, 1990
K022	Wastewater	Aug. 8, 1990
K022	nonwastewater	Aug. 8, 1988
K022	Soil & debris	Aug. 8, 1990
K023	Soil & debris	June 8, 1991
K023	All others	June 8, 1989
K024	Soil & debris	Aug. 8, 1990
K024	All others	Aug. 8, 1988
K025	All	Aug. 8, 1990
K026	All	Aug. 8, 1990
K027	Soil & debris	June 8, 1991
K027	All others	June 8, 1989
K028	Soil & debris	June 8, 1991
K028 metals	Nonwastewater	Aug. 8, 1990
K028	All othres	June 8, 1989
K029	Wastewater	Aug. 8, 1990
K029	nonwastewater	June 8, 1989
K029	Soil & debris	June 8, 1991
K030	Soil & debris	Aug. 8, 1990
K030	All others	Aug. 8, 1988
K031	Wastewater	Aug. 8, 1990
K031	Nonwastewater	May 8, 1992
K032	All	Aug. 8, 1990
K033	All	Aug. 8, 1990
K034	All	Aug. 8, 1990
K035	All	Aug. 8, 1990
K036	jAll	Aug. 8, 1990
K037	Soil & debris	Aug. 8, 1990
K037	Wastewater	Aug. 8, 1990
K037	All others	Aug. 8, 1988
K038	Soil & debris	June 8, 1991
K038	All others	June 8, 1989
K039	Soil & debris	June 8, 1991
K039	All others	June 8, 1989
K040	Soil & debris	June 8, 1991
K040	All others	June 8, 1989
K041	All	Aug. 8, 1990
K042	All	Aug. 8, 1990
K043	Soil & debris	Aug. 8, 1988
K043	All others	Aug. 8, 1990
K044	All	Aug. 8, 1990
K045	All	Aug. 8, 1990
K046	Nonreactive nonwastewater	Aug. 8, 1988
K046	All others	Aug. 8, 1990
K047	All	Aug. 8, 1990
K048	Wastewater	Aug. 8, 1990
K048	Nonwastewater	Nov. 8, 1990
K049	Wastewater	Aug. 8, 1990
K049	nonwastewater	Nov. 8, 1990

K050	Wastewater	Aug. 8, 1990
K050	Nonwastewater	Nov. 8, 1990
K051	Wastewater	Aug. 8, 1990
K051	Nonwastewater	Nov. 8, 1990
K052	Wastewater	Aug. 8, 1990
K052	Nonwastewater	Nov. 8, 1990
K060	All	Aug. 8, 1990
K061	Wastewater	Aug. 8, 1990
K061	Nonwastewater	Aug. 8, 1988
K062	All	Aug. 8, 1988
K069	All	Aug. 8, 1990
K073	All	Aug. 8, 1990
K083	All	Aug. 8, 1990
K084	Wastewater	May 8, 1992
K084	Nonwastewater	Aug. 8, 1990
K085	All	Aug. 8, 1990
K086	All	Aug. 8, 1990
K087	Soil & debris	Aug. 8, 1990
K087	All others	Aug. 8, 1988
K093	Soil and debris	June 8, 1991
K093	All others	June 8, 1989
K094	Soil & debris	June 8, 1991
K094	All others	June 8, 1989
K095	wastewater	Aug. 8, 1990
K095	Nonwastewater	June 8, 1989
K095	Soil & debris	June 8, 1991
K096	Wastewater	Aug. 8, 1990
K096	Nonwastewater	June 8, 1989
K096	Soil & debris	June 8, 1991
K097	All	Aug. 8, 1990
K098	All	Aug. 8, 1990
K099	All	Aug. 8, 1988
K100	All	Aug. 8, 1990
K101	Wastewater	Aug. 8, 1988
K101	nonwastewater	May 8, 1992
K102	Wastewater	Aug. 8, 1988
K102	Nonwastewater	May 8, 1992
K103	Soil & debris	Aug. 8, 1990
K103	All others	Aug. 8, 1988
K104	Soil and debris	Aug. 8, 1990
K014	All others	Aug. 8, 1988
K105	All	Aug. 8, 1990
K106	High mercury nonwastewater	May 8, 1992
K106	Low mercury nonwastewater	May 8, 1992
K106	All others	Aug. 8, 1990
K113	Soil & debris	June 8, 1991
K113	All others	June 8, 1989
K114	Soil & debris	June 8, 1991
K114	All others	June 8, 1989
K115	Soil & debris	June 8, 1991
K115	All others	June 8, 1989
K116	Soil & debris	June 8, 1991
K116	All others	June 8, 1989

P001	All	Aug. 8, 1990
P002	All	Aug. 8, 1990
P003	All	Aug. 8, 1990
P004	All	Aug. 8, 1990
P005	All	Aug. 8, 1990
P006	All	Aug. 8, 1990
P007	All	Aug. 8, 1990
P008	All	Aug. 8, 1990
P009	All	Aug. 8, 1990
P010	Wastewater	Aug. 8, 1990
P010	Nonwastewater	May 8, 1992
P011	Wastewater	Aug. 8, 1990
P011	Nonwastewater	May 8, 1992
P012	Wastewater	Aug. 8, 1990
P012	Nonwastewater	May 8, 1992
P013	All	Aug. 8, 1990
P014	All	Aug. 8, 1990
P015	All	Aug. 8, 1990
P016	All	Aug. 8, 1990
P017	All	Aug. 8, 1990
P018	All	Aug. 8, 1990
P020	All	Aug. 8, 1990
P021	All	June 8, 1989
P022	All	Aug. 8, 1990
P023	All	Aug. 8, 1990
P024	All	Aug. 8, 1990
P026	All	Aug. 8, 1990
P027	All	Aug. 8, 1990
P028	All	Aug. 8, 1990
P029	All	June 8, 1989
P030	All	June 8, 1989
P031	All	Aug. 8, 1990
P033	All	Aug. 8, 1990
P034	All	Aug. 8, 1990
P036	Wastewater	Aug. 8, 1990
P036	Nonwastewater	May 8, 1992
P037	All	Aug. 8, 1990
P038	Wastewater	Aug. 8, 1990
P038	Nonwastewater	May 8, 1992
P039	Soil & debris	June 8, 1991
P039	All others	June 8, 1989
P040	Soil and debris	June 8, 1991
P040	All others	June 8, 1989
P041	Soil land debris	June 8, 1991
P041	All others	June 8, 1989
P042	All	Aug. 8, 1990
P043	Soil & debris	June 8, 1991
P043	All others	June 8, 1989
P044	Soil & debris	June 8, 1991
P044	All others	June 8, 1989
P045	All	Aug. 8, 1990
P046	All	Aug. 8, 1990
P047	All	Aug. 8, 1990
P048	All	Aug. 8, 1990
P049	All	Aug. 8, 1990
P050	All	Aug. 8, 1990
P051	All	Aug. 8, 1990
P054	All	Aug. 8, 1990
P056	All	Aug. 8, 1990
P057	All	Aug. 8, 1990
P058	All	Aug. 8, 1990
P059	All	Aug. 8, 1990
P060	All	Aug. 8, 1990
P062	Soil & debris	June 8, 1991
P062	All others	June 8, 1989
P063	All	June 8, 1989
P064	All	Aug. 8, 1990
P065	High mercury nonwastewater	May 8, 1992
P065	Low mercury nonwastewater	May 8, 1992
P065	All others	Aug. 8, 1990
P066	All	Aug. 8, 1990
P067	All	Aug. 8, 1990
P068	All	Aug. 8, 1990
P069	All	Aug. 8, 1990
P070	All	Aug. 8, 1990
P071	Soil & debris	June 8, 1991
P071	All others	June 8, 1989

P072	All	Aug. 8, 1990
P073	All	Aug. 8, 1990
P074	All	June 8, 1989
P075	All	Aug. 8, 1990
P076	All	Aug. 8, 1990
P077	All	Aug. 8, 1990
P078	All	Aug. 8, 1990
P081	All	Aug. 8, 1990
P082	All	Aug. 8, 1990
P084	All	Aug. 8, 1990
P085	Soil & debris	June 8, 1991
P085	All others	June 8, 1989
P087	All	May 8, 1992
P088	All	Aug. 8, 1990
P089	Soil & debris	June 8, 1991
P089	All others	June 8, 1989
P092	High mercury nonwastewater	May 8, 1992
P092	Low mercury nonwastewater	May 8, 1992
P092	All others	Aug. 8, 1990
P093	Soil & debris	May 8, 1992
P093	All others	Aug. 8, 1990
P094	Soil & debris	June 8, 1991
P094	All others	June 8, 1989
P095	Soil & debris	May 8, 1992
P095	All others	Aug. 8, 1990
P096	All	Aug. 8, 1990
P097	Soil & debris	June 8, 1991
P097	All others	June 8, 1989
P098	All	June 8, 1989
P099 silver	Wastewater	Aug. 8, 1990
P099 cyanides	Wastewater	June 8, 1989
P099 cyanides/ silver	Nonwastewater	June 8, 1989
P101	All	Aug. 8, 1990
P102	All	Aug. 8, 1990
P103	All	Aug. 8, 1990
P104 silver	Wastewater	Aug. 8, 1990
P104 cyanides	Wastewater	June 8, 1989
P104 cyanides/ silver	Nonwastewater	June 8, 1989
P105	All	Aug. 8, 1990
P106	All	June 8, 1989
P108	Soil & debris	May 8, 1992
P108	All others	Aug. 8, 1990
P109	Soil and debris	June 8, 1991
P109	All others	June 8, 1989
P110	All	Aug. 8, 1990
P111	Soil & debris	June 8, 1991
P111	All others	June 8, 1989
P112	All	Aug. 8, 1990
P113	All	Aug. 8, 1990
P114	All	Aug. 8, 1990
P115	All	Aug. 8, 1990
P116	Soil & debris	May 8, 1992
P116	All others	Aug. 8, 1990
P118	Soil & debris	May 8, 1992
P118	All others	Aug. 8, 1990
P119	All	Aug. 8, 1990
P120	All	Aug. 8, 1990
P121	All	June 8, 1989
P122	All	Aug. 8, 1990
P123	All	Aug. 8, 1990
U001	All	Aug. 8, 1990
U002	All	Aug. 8, 1990
U003	Soil & debris	May 8, 1992
U003	All others	Aug. 8, 1990
U004	All	Aug. 8, 1990
U005	All	Aug. 8, 1990
U006	Soil & debris	May 8, 1992
U006	All others	Aug. 8, 1990
U007	Soil & debris	May 8, 1992
U007	All others	Aug. 8, 1990
U008	All	Aug. 8, 1990
U009	All	Aug. 8, 1990
U010	Soil & debris	May 8, 1992
U010	All others	Aug. 8, 1990

U011	Soil & debris	May 8, 1992
U011	All others	Aug. 8, 1990
U012	All	Aug. 8, 1990
U014	Soil & debris	May 8, 1992
U014	All others	Aug. 8, 1990
U015	Soil & debris	May 8, 1992
U015	All others	Aug. 8, 1990
U016	All	Aug. 8, 1990
U017	Soil & debris	May 8, 1992
U017	All others	Aug. 8, 1990
U018	All	Aug. 8, 190
U019	All	Aug. 8, 1990
U020	Soil & debris	May 8, 1992
U020	All others	Aug. 8, 1990
U021	Soil & debris	May 8, 1992
U021	All others	Aug. 8, 1990
U022	All	Aug. 8, 1990
U023	All	Aug. 8, 1990
U024	All	Aug. 8, 1990
U025	All	Aug. 8, 1990
U026	Soil & debris	May 8, 1992
U026	All others	Aug. 8, 1990
U027	All	Aug. 8, 1990
U028	Soil & debris	June 8, 1991
U028	All others	June 8, 1989
U029	All	Aug. 8, 1990
U030	All	Aug. 8, 1990
U031	All	Aug. 8, 1990
U032	All	Aug. 8, 1990
U033	Soil & debris	May 8, 1992
U033	All others	Aug. 8, 1990
U034	Soil & debris	May 8, 1992
U034	All others	Aug. 8, 1990
U035	Soil & debris	May 8, 1992
U035	All others	Aug. 8, 1990
U036	All	Aug. 8, 1990
U037	All	Aug. 8, 1990
U038	Soil & debris	May 8, 1992
U038	All others	Aug. 8, 1990
U039	All	Aug. 8, 1990
U041	Soil & debris	May 8, 1992
U041	All others	Aug. 8, 1990
U042	Soil & debris	May 8, 1992
U042	All others	Aug. 8, 1990
U043	All	Aug. 8, 1990
U044	All	Aug. 8, 1990
U045	All	Aug. 8, 1990
U046	Soil & debris	May 8, 1992
U046	All others	Aug. 8, 1990
U047	All	Aug. 8, 1990
U048	All	Aug. 8, 1990
U049	Soil & debris	May 8, 1992
U049	All others	Aug. 8, 1990
U050	All	Aug. 8, 1990
U051	All	Aug. 8, 1990
U052	All	Aug. 8, 1990
U053	All	Aug. 8, 1990
U055	All	Aug. 8, 1990
U056	All	Aug. 8, 1990
U057	All	Aug. 8, 1990
U058	Soil & debris	June 8, 1992
U058	All others	June 8, 1989
U059	Soil & debris	May 8, 1992
U059	All others	Aug. 8, 1990
U060	Soil & debris	May 8, 1992
U060	All others	Aug. 8, 1990
U061	Soil & debris	May 8, 1992
U061	All others	Aug. 8, 1990
U062	Soil & debris	May 8, 1992
U062	All others	Aug. 8, 1990
U063	All	Aug. 8, 1990
U064	All	Aug. 8, 1990
U066	All	Aug. 8, 1990
U067	All	Aug. 8, 1990
U068	All	Aug. 8, 1990
U069	Soil & debris	June 8, 1991

U069	All othres	June 8, 1989
U070	All	Aug. 8, 1990
U071	All	Aug. 8, 1990
U072	All	Aug. 8, 1990
U073	Soil & debris	May 8, 1992
U073	All others	Aug. 8, 1990
U074	Soil & debris	May 8, 1992
U074	All others	Aug. 8, 1990
U075	All	Aug. 8, 1990
U076	All	Aug. 8, 1990
U077	All	Aug. 8, 1990
U078	All	Aug. 8, 1990
U079	All	Aug. 8, 1990
U080	All	Aug. 8, 1990
U081	All	Aug. 8, 1990
U082	All	Aug. 8, 1990
U083	All	Aug. 8, 1990
U084	All	Aug. 8, 1990
U085	All	Aug. 8, 1990
U086	All	Aug. 8, 1990
U087	Soil & debris	June 8, 1991
U087	All others	June 8, 1989
U0088	Soil & debris	June 8, 1991
U088	All others	June 8, 1989
U089	All	Aug. 8, 1990
U090	All	Aug. 8, 1990
U091	Soil & debris	May 8, 1992
U091	All others	Aug. 8, 1990
U092	Soil & debris	May 8, 1992
U092	All others	Aug. 8, 1990
U093	Soil & debris	May 8, 1992
U093	All others	Aug. 8, 1990
U094	All	Aug. 8, 1990
U095	Soil & debris	May 8, 1992
U095	All others	Aug. 8, 1990
U096	All	Aug. 8, 1990
U097	Soil & debris	May 8, 1992
U097	All others	Aug. 8, 1990
U098	All	Aug. 8, 1990
U099	All	Aug. 8, 1990
U101	All	Aug. 8, 1990
U102	Soil & debris	June 8, 1991
U102	All others	June 8, 1989
U103	All	Aug. 8, 1990
U105	All	Aug. 8, 1990
U106	All	Aug. 8, 1990
U107	Soil & debris	June 8, 1991
U107	All others	June 8, 1989
U108	All	Aug. 8, 1990
U019	All	Aug. 8, 1990
U110	Soil & debris	May 8, 1992
U110	All others	Aug. 8, 1990
U111	All	Aug. 8, 1990
U112	All	Aug. 8, 1990
U113	All	Aug. 8, 1990
U114	Soil & debris	May 8, 1992
U114	All others	Aug. 8, 1990
U115	All	Aug. 8, 1990
U116	Soil & debris	May 8, 1992
U116	All others	Aug. 8, 1990
U117	All	Aug. 8, 1990
U118	All	Aug. 8, 1990
U119	Soil & debris	May 8, 1992
U119	All others	Aug. 8, 1990
U120	All	Aug. 8, 1990
U121	All	Aug. 8, 1990
U122	All	Aug. 8, 1990
U123	All	Aug. 8, 1990
U124	All	Aug. 8, 1990
U125	All	Aug. 8, 1990
U126	All	Aug. 8, 1990
U127	All	Aug. 8, 1990
U128	All	Aug. 8, 1990
U129	All	Aug. 8, 1990
U130	Soil & debris	May 8, 1992
U130	All others	Aug. 8, 1990
U131	All	Aug. 8, 1990

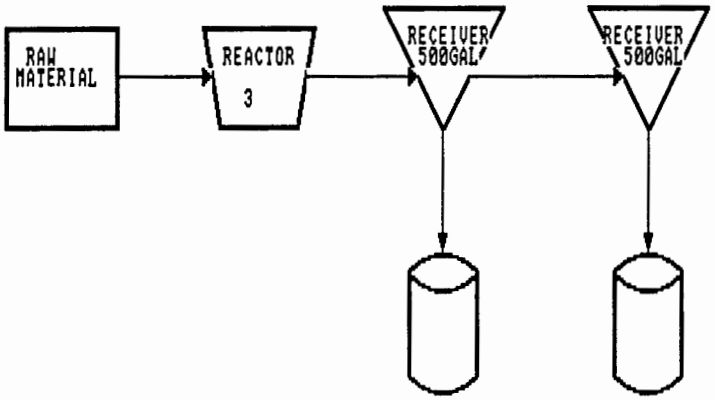
U132	Soil & debris	May 8, 1992
U132	All others	Aug. 8, 1990
U133	All	Aug. 8, 1990
U134	All	Aug. 8, 1990
U135	All	Aug. 8, 1990

U136	Wastewater	Aug. 8, 1990
U136	nonwastewater	May 8, 1992
U137	All	Aug. 8, 1990
U138	All	Aug. 8, 1990
U140	All	Aug. 8, 1990
U141	All	Aug. 8, 1990
U142	All	Aug. 8, 1990
U143	Soil & debris	May 8, 1992
U143	All othres	Aug. 8, 1990
U144	All	Aug. 8, 1990
U145	All	Aug. 8, 1990
U146	All	Aug. 8, 1990
U147	All	Aug. 8, 1990
U148	Soil & debris	May 8, 1992
U148	All others	Aug. 8, 1990
U149	Soil & debris	May 8, 1992
U149	All others	Aug. 8, 1990
U150	Soil & debris	May 8, 1992
U150	All others	Aug. 8, 1990
U151	High mercury nonwastewater	May 8, 1992
U151	Low mercury nonwastewater	May 8, 1992
U151	Soil & debris	May 8, 1992
U151	All others	Aug. 8, 1990
U152	All	Aug. 8, 1990
U153	Soil & debris	May 8, 1992
U153	All others	Aug. 8, 1990
U154	All	Aug. 8, 1990
U155	All	Aug. 8, 1990
U156	Soil and debris	May 8, 1992
U156	All others	Aug. 8, 1990
U157	All	Aug. 8, 1990
U158	All	Aug. 8, 1990
U159	All	Aug. 8, 1990
U160	All	Aug. 8, 1990
U161	All	Aug. 8, 1990
U162	All	Aug. 8, 1990
U163	Soil and debris	May 8, 1992
U163	All others	Aug. 8, 1990
U164	Soil and debris	May 8, 1992
U164	All others	Aug. 8, 1990
U165	All	Aug. 8, 1990
U166	All	Aug. 8, 1990
U167	Soil and debris	May 8, 1992
U167	All others	Aug. 8, 1990
U168	Soil and debris	May 8, 1992
U168	All others	Aug. 8, 1990
U169	All	Aug. 8, 1990
U170	All	Aug. 8, 1990
U171	Soil and debris	May 8, 1992
U171	All others	Aug. 8, 1990
U172	All	Aug. 8, 1990
U173	Soil and debris	May 8, 1992
U173	All others	Aug. 8, 1990
U174	All	Aug. 8, 1990
U176	Soil and debris	May 8, 1992
U176	All others	Aug. 8, 1990
U177	Soil and debris	May 8, 1992
U177	All others	Aug. 8, 1990
U178	Soil & debris	May 8, 1992
U178	All others	Aug. 8, 1990
U179	All	Aug. 8, 1990
U180	All	Aug. 8, 1990
U181	All	Aug. 8, 1990
U182	All	Aug. 8, 1990
U183	All	Aug. 8, 1990
U184	Soil & debris	May 8, 1992
U184	All others	Aug. 8, 1990
U185	All	Aug. 8, 1990
U186	All	Aug. 8, 1990
U187	All	Aug. 8, 1990
U188	All	Aug. 8, 1990
U189	All	Aug. 8, 1990
U190	Soil & debris	June 8, 1991
U190	All others	June 8, 1989
U191	Soil and debris	May 8, 1992
U191	All others	Aug. 8, 1990
U192	All	Aug. 8, 1990

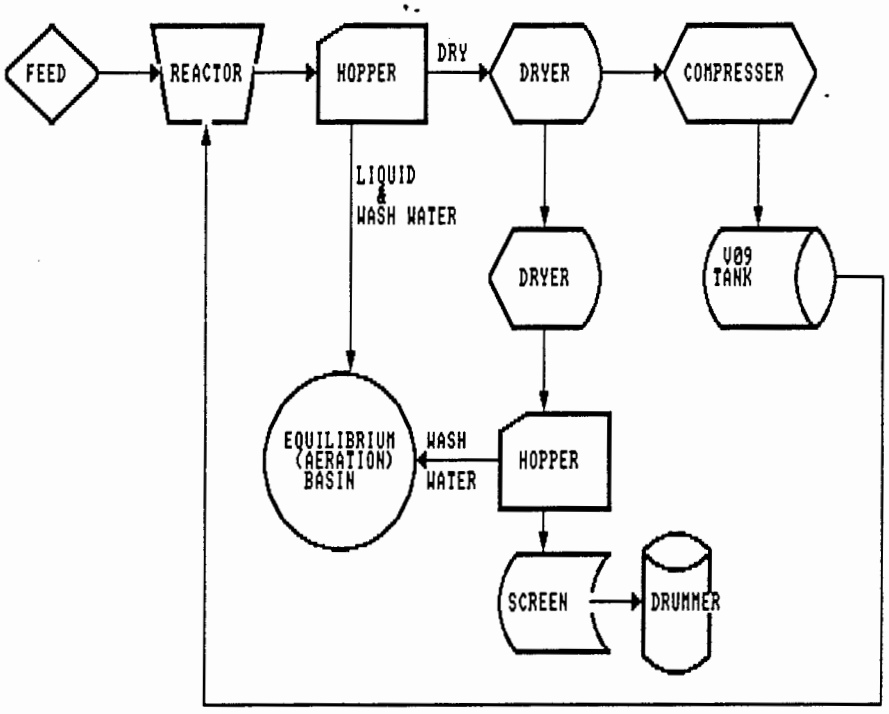
U193	Soi and debris	May 8, 1992
U193	All others	Aug. 8, 1990
U194	Soil and debris	May 8, 1992
U194	All others	Aug. 8, 1990
U196	All	Aug. 8, 1990
U197	All	Aug. 8, 1990
U200	Soil and debris	May 8, 1992
U200	All others	Aug. 8, 1990
U201	All	Aug. 8, 1990
U202	Soil and debris	May 8, 1992
U202	All others	Aug. 8, 1990
U203	All	Aug. 8, 1990
U204	All	Aug. 8, 1990
U205	All	Aug. 8, 1990
U206	Soil and debris	May 8, 1992
U206	All others	Aug. 8, 1990
U207	All	Aug. 8, 1990
U208	All	Aug. 8, 1990
U209	All	Aug. 8, 1990
U210	All	Aug. 8, 1990
U211	All	Aug. 8, 1990
U213	All	Aug. 8, 1990
U214	All	Aug. 8, 1990
U215	All	Aug. 8, 1990
U216	All	Aug. 8, 1990
U217	All	Aug. 8, 1990
U218	Soil and debris	May 8, 1992
U218	All others	Aug. 8, 1990
U219	Soil and debris	May 8, 1992
U219	All others	Aug. 8, 1990
U220	All	Aug. 8, 1990
U221	Soil and debris	June 8, 1991
U221	All others	June 8, 1989
U222	Soil and debris	May 8, 1992
U222	All others	Aug. 8, 1990
U223	Soi and debris	June 8, 1991
U223	All others	June 8, 1989
U225	All	Aug. 8, 1990
U226	All	Aug. 8, 1990
U227	All	Aug. 8, 1990
U228	All	Aug. 8, 1990
U234	Soil and debris	May 8, 1992
U234	All others	Aug. 8, 1990
U235	Soil and debris	June 8, 1991
U235	All others	June 8, 1989
U236	Soil and debris	May 8, 1992
U236	All others	Aug. 8, 1990
U237	Soil and debris	May 8, 1992
U237	All others	Aug. 8, 1990
U238	Soil and debris	May 8, 1992
U238	All others	Aug. 8, 1990
U239	All	Aug. 8, 1990
U240	Soil and debris	May 8, 1992
U240	All others	Aug. 8, 1990
U243	All	Aug. 8, 1990
U244	Soil and debris	May 8, 1992
U244	All others	Aug. 8, 1990
U246	All	Aug. 8, 1990
U247	All	Aug. 8, 1990
U248	All	Aug. 8, 1990
U249	All	Aug. 8, 1990

ATTACHMENT 3

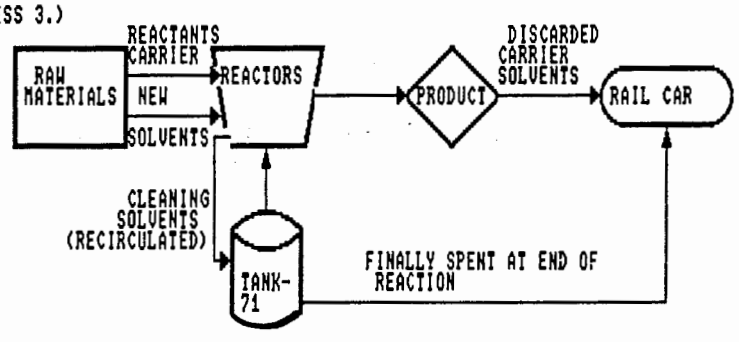
PROCESS 1.)



PROCESS 2.)



PROCESS 3.)



MARCH 1991

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF GENERATORS

Name of Facility: Hickson Dan Chem Corporation

Address: P.O. Box 400, 1975 Richmond Blvd.
Danville, VA. 24543

EPA ID Number: VAD984170684

Facility Representative: Stephen J. Jelich

Title: Vice President, Operations

Telephone Number (804) 797-8110

Inspector's Name: Ken Morris / Steve Frazier

Title: chemist / chemist

Date of Inspection: 1/23/92

Va. Hazardous Waste Reg.	Generator Checklist	
6.3.	1. Is a manifest system currently being used for all hazardous waste shipped off site?	(YES) NO
6.2.C.	2. Has the generator determined that the transporter(s) and facility have an EPA ID number? [Note: Shipments to POTWs must be manifested and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.]	(YES) NO
5.5.A.7	3. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit?	(YES) NO
6.3 5.3.B.1.	4. Is the following information on the manifest:	

	a. The generator's name, mailing address, EPA ID Number, and telephone number?	(YES) NO
5.3.B.2.	b. A unique five digit number assigned to this manifest by the generator?	(YES) NO
5.3.B.3.	c. The total number of pages of the manifest?	(YES) NO
5.3.B.4.	d. The company name and EPA ID number of each transporter used?	(YES) NO
5.3.B.5.	e. The company name, site address, and EPA ID number of the facility designated to receive the waste?	(YES) NO
5.3.B.6.	f. The U. S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	(YES) NO
5.3.B.7.	g. The quantities of waste being shipped?	(YES) NO
5.3.C.	h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment."	(YES) NO

6.5.C.2.	5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago?	(YES)	NO
	If no, has the generator filed an exception report with the Executive Director which included:	YES	NO N/A
6.5.C.2.a.	a. A legible copy of the manifest for which the generator does not have confirmation of the delivery; and	YES	NO
6.5.C.2.b.	b. A cover letter explaining the efforts taken to locate the shipment?	YES	NO N/A
6.4.E.1.	6. Is hazardous waste being accumulated on-site for less than 90 days? If yes,	(YES)	NO
6.4.E.1.a.	a. Is the waste stored in containers? In tanks? (If answer to either question is yes, fill out appropriate checklists. If both answers are no, interim status or a TSD permit is required - fill out facility checklist to determine compliance status).	(YES) YES	NO (NO)
6.4.E.1.b.	b. Is the date that accumulation begins clearly marked and visible for inspection on each container?	(YES)	NO
6.4.E.1.c.	c. Is each container and tank clearly marked with the words "Hazardous Waste"?	(YES)	NO
6.4.E.1.e.	d. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing accumulation areas, and at least 15 days prior to use for subsequently established accumulation areas?	(YES)	NO
6.4.E.2.	7. Does the generator accumulate (store) hazardous waste on-site for greater than 90 days? If yes, interim status or a TSD permit is required - fill out facility checklist to determine compliance status.	YES	(NO)
6.4.E.1.d.	8. Does the generator record inspections	(YES)	NO

9.1.F.4.	in an inspection log?	
6.4.E.1.d. 9.1.G.1.	9. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	(YES) NO
9.1.G.2.	10. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility?	(YES) NO
9.1.G.3.	11. Do personnel participate in an annual review of the initial training?	(YES) NO
	12. Does the facility maintain a record of the following:	
9.1.G.4.a.	a. job titles for each position at the facility related to hazardous waste management; and	(YES) NO
9.1.G.4.a.	b. the name of the employee filling each job; and	(YES) NO
9.1.G.4.b	c. a written job description for each position in (a); and	(YES) NO
9.1.G.4.c.	d. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (a); and	(YES) NO
9.1.G.4.d.	e. Records that document that the training or job experience required above has been given to, and completed by facility personnel?	(YES) NO
9.2.B. 9.2.D.	13. At the facility, is the following equipment installed:	

9.2.B.1.	a. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion?	YES NO
9.2.B.2.	b. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.?	YES NO
9.2.B.3.	c. Portable fire extinguishers, fire control, and decontamination equipment?; and	YES NO
9.2.B.4.	d. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system?	YES NO
9.2.C.	14. Is a record of tests and inspections of items 13 a-d maintained at the facility?	YES NO
9.2.E.	15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies?	YES NO
6.4.E.1.d. 9.3.	16. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water?	YES NO
9.3.B.	17. Does the contingency plan contain the following elements:	

9.3.B.(1,2). **a.** A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water? (YES) NO

9.3.B.3. **b.** A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required? (YES) NO

9.3.B.4. **c.** A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator. YES (NO) ✓ * Need Address (Home)

Name Stephen J. Jelich

Title Vice President, Operations

Telephone (804) 797-8100

9.3.B.5. **d.** A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? (YES) NO

9.3.B.6. **e.** Does this list specify the location and physical description of each item on the list and a brief outline of its capabilities? (YES) NO

9.3.B.6. **f.** An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? (YES) NO

9.3.C. **g.** Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? (YES) NO

List:

Danville Fire Department
Virginia State Police
Memorial Hospital
Danville City Police
Danville Life Saving Crew
Ringgold Vol. Fire Dept.
Administration, Pottsylvania Co.

9.3.C.	h. Is there documentation to indicate the personnel listed above received the contingency plan?	YES	NO
9.3.F.(9,10).	i. Has the contingency plan ever been implemented?	YES	NO
	If yes, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed?	YES	NO N/A
6.4.E.3.a.	18. Does the generator have satellite accumulation areas? If yes,	YES	NO
	a. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	YES	NO N/A
6.4.E.3.a.(1) 9.8.B.	b. Are the containers in good condition?	YES	NO
6.4.E.3.a.(1) 9.8.C.	c. Are the containers compatible with the waste?	YES	NO
6.4.E.3.a.(1) 9.8.D.1.	d. Are the containers kept closed except as necessary to add or remove waste?	YES	NO
6.4.E.3.a.(2)	e. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	YES	NO
6.5.E.3.b.	f. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,	YES	NO
	(1) Has the generator marked the excess amount with the date the excess amount began accumulating?	YES	NO
	(2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas listed in question 5 on this checklist? Namely, has he notified the	YES	NO N/A

Executive Director about the location of the accumulation area?

If no, what has the generator chosen to do? _____

_____

6.5.A. 19. Does the generator retain copies of all manifests, annual reports, and test results for at least three years? (YES) NO

6.5.B. 20. Has the facility submitted an annual report for the preceding calendar year? (YES) NO

21. Comments: _____

_____

_____

_____

_____

_____

_____

MARCH 1991

INSPECTION CHECKLIST FOR THE USE AND MANAGEMENT OF CONTAINERS

Name of Facility: Hickson DanChem. Corporation

Address: P.O. Box 400, 1975 Richmond Blvd.
Danville, VA. 24543

EPA ID Number: VAD988170684

Facility Inspection Representative: Stephen J. Jelich

Title: Vice President, Operations

Telephone Number: (804) 797-8110

Inspector's Name: Ken Morris / Steve Frazier

Title: Chemist / Chemist

Date of Inspection: 1/23/92

Va. Hazardous Waste Reg.		
9.8.B.	1. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? If no, list the storage/accumulation areas where there are problems and the type of problem: Location _____ Problem _____ _____ _____ _____ _____ _____ _____ _____ _____	(YES) NO
9.8.C.	2. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?	(YES) NO

6.4.E.b	3. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?	YES (NO) ✓
6.4.E.c.	4. Is the container labeled or marked clearly with the words "Hazardous Waste"?	(YES) NO
9.8.D.1.	5. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? If no, list the locations where open containers are found. _____ _____ _____ _____	(YES) NO
9.8.E.	6. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?	(YES) NO
9.1.F.2.a. 9.1.F.4. 6.4.E.1.d.	7. For large quantity generators and TSD facilities only: Is an inspection log maintained?	(YES) NO
9.8.F.	8. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line?	(YES) NO
9.8.G.1.	9. Are incompatible wastes placed in separate containers?	(YES) NO
9.8.G.3.	10. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?	(YES) NO

6.4.E.3.a. **11.** For satellite accumulation areas:

a. Is the area at or near the point the point of generation? (If no, the area is not a satellite accumulation area, and inspection and notification requirements are applicable). YES NO N/A

b. Are there more than 55 gallons of any one type of waste present in the area? YES NO

If yes,

6.4.E.3.b **c.** Has the amount in excess of 55 gallons been in the satellite accumulation area longer than 3 days? YES NO

If yes,

6.4.E.3.b. 6.4.E.1.b. **d.** Has the company notified the Department about the location of the accumulation area? YES NO N/A

10. Comments:

_____

_____

_____

_____

_____

_____

_____

_____

Stuart

COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT
11th Floor, Monroe Building
101 N. 14th Street
Richmond, VA 23219
(804) 225-2667
TDD (804) 371-8737

FEB 12 1992

Mr. Stephen J. Jelich
Vice President, Operations
Hickson DanChem Corporation
P.O. Box 400
1975 Richmond Blvd.
Danville, Virginia 24543

Re: RCRA Inspection
EPA ID# VAD988170684

Dear Mr. Jelich:

During a recent inspection (January 23, 1992), it was found that your facility was not in compliance with portions of the Virginia Hazardous Waste Management Regulations (VHWMR) for Large Quantity Generators. These instances are indicated on the enclosed checklists and are shown below:

1. Contingency Plan:

   The contingency plan did not contain the home address of the emergency coordinator (VHWMR § 9.3.B.4)

2. Container Management:

   Several containers in the hazardous waste storage areas of Plant No. 1 did not have the date upon which each period of accumulation had begun marked on the container (VHWMR § 6.4.E.b)

Based on the above non-compliance items, we recommend that you implement the following corrective actions to bring your facility into compliance with the VHWMR.

1. Please include the home address of the emergency

coordinator in your contingency plan. Although your contingency plan will so be revised, please send a copy of the revised contingency plan to this Department.

2. Please make sure that all containers of hazardous waste are marked clearly with the date that the accumulation of waste begins.

During the inspection it was noticed that some of the analytical test results (water from the equalization basin) from the City of Danville show levels of constituents that are included in the Toxicity Characteristic Leaching Procedure (TCLP). The pertinent data is shown below:

1.) December 30, 1991 Glenn Giles (reference GG-160) sampling from November 3-15, 1991: Report on compliance with Categorical Pretreatment Standards; showed the level of chloroform to be 9.0 ppm for the daily maximum and 3.0 for the maximum monthly average. This same report showed the level of lead to be 70 ppm for a daily maximum and 33.8 ppm for the maximum monthly average.

2.) The sampling report from May 21-24, 1991 (GG-89) showed analytical test results for chloroform to have a maximum of 12.1 ppm.

It is understood that prior to the promulgation of the TCLP rules, your company may have been exempt from the Hazardous Waste Management Regulations for mixtures of wastewaters and certain listed wastes contained in §§ 3.10.E.2 and 3.10.E.3 for *de minimis* losses. However, as of September 29, 1990 (compliance date for generators), the new TCLP rule affected several generators. This is based on the fact that there is the likelihood that the previously exempt wastewaters may now fail the TCLP in cases where the small quantities of listed solvents is particularly high. In this case, since the values for both the chloroform and the lead were significant in the discharge from the equalization basin, it can only be concluded that the concentrations of these constituents going directly into the equalization basin are higher. Therefore, the values may exceed the TCLP limits. If the TCLP limits are being exceeded, then the equalization basin process would be considered unauthorized treatment of hazardous waste. From this conclusion, Hickson DanChem Corporation should provide documentation of TCLP analysis for the waste stream going to the equalization basin (before it enters the basin).

Hickson DanChem Corporation should respond within 60-days to the non-compliance areas noted above. This response should be in writing to the Department addressing the actions taken by the facility to meet compliance with the VHWMR.

Thank you for your cooperation during the inspection. If you have any questions, please call me at (804) 225-2992.

Sincerely,

Kenneth A. Morris

Kenneth A. Morris
Analytical Chemist Sr.
Compliance and Enforcement

Enclosure

KAM:KAM

MARCH 1991

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

Name of Facility: Hickson DanChem Corporation

Address: P.O. Box 400 1975 Richmond Blvd.
Danville, VA. 24543

EPA ID Number: VAD988170684

Facility Representative: Stephen J. Jelich

Title: Vice President, Operations

Telephone Number: (804) 797-8110

Inspector's Name: Ken Morris / Steve Frazier

Title: Chemist / Chemist

Date of Inspection: 1/23/92

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.) Specialty Chemical manufacturer

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

see Attachment 1

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
*	*	*

* = See attachment 1

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)? YES (NO)

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste? YES (NO)

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed).
off-site TSDs - EcoFlo - drum generally
Petro-Chem Processing ~~MIDOT~~ MID 980615298
Oldover - bulk generally

6. Does the facility generate any hazardous waste that is excluded from regulation? If yes, list the waste and the basis for exclusion. YES (NO)

7. Does the facility generate any hazardous waste that is burned for energy recovery (hazardous waste fuel)? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. (YES) NO
Oldover -
EcoFlo - ~~the~~ fuels blending program

8. Does the facility generate any used oil that is burned for energy recovery (used oil fuel), including used oil that is also a characteristic hazardous waste, or used oil that is mixed with hazardous waste generated by a conditionally exempt Small Quantity Generator? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. (YES) NO
lubricating oil from machines
to Safety-Klean - ca. 3 dr/quarter

9. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist. YES (NO)

_____

_____

_____

10. Does the facility transport, collect or reclaim spent lead-acid batteries? If yes, complete the Recyclable Materials Checklist. YES (NO)

11. Based on the above, the facility is a:

a. conditionally exempt small quantity generator
b. small quantity generator
(c.) generator
d. permitted or interim status TSD
e. unpermitted TSD (explain in comments section)

[Circle All That Are Applicable]

12. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5 55-gallon drums) of non-acute hazardous waste, at which time the accumulation times (180 days or 270 days) for small quantity generators begins.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

13. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	Number of Containers	Number of Tanks	Capacity
*A	37-55gal Drums		
*B	48-55gal. Drums		

14. Comments

* = See Attachment 2

Transporters: Nortru MID021087275

Suttles Truck ALD095704011

ECOFLO

Oldover

15. Waste Management Flow Diagram

(On this page sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

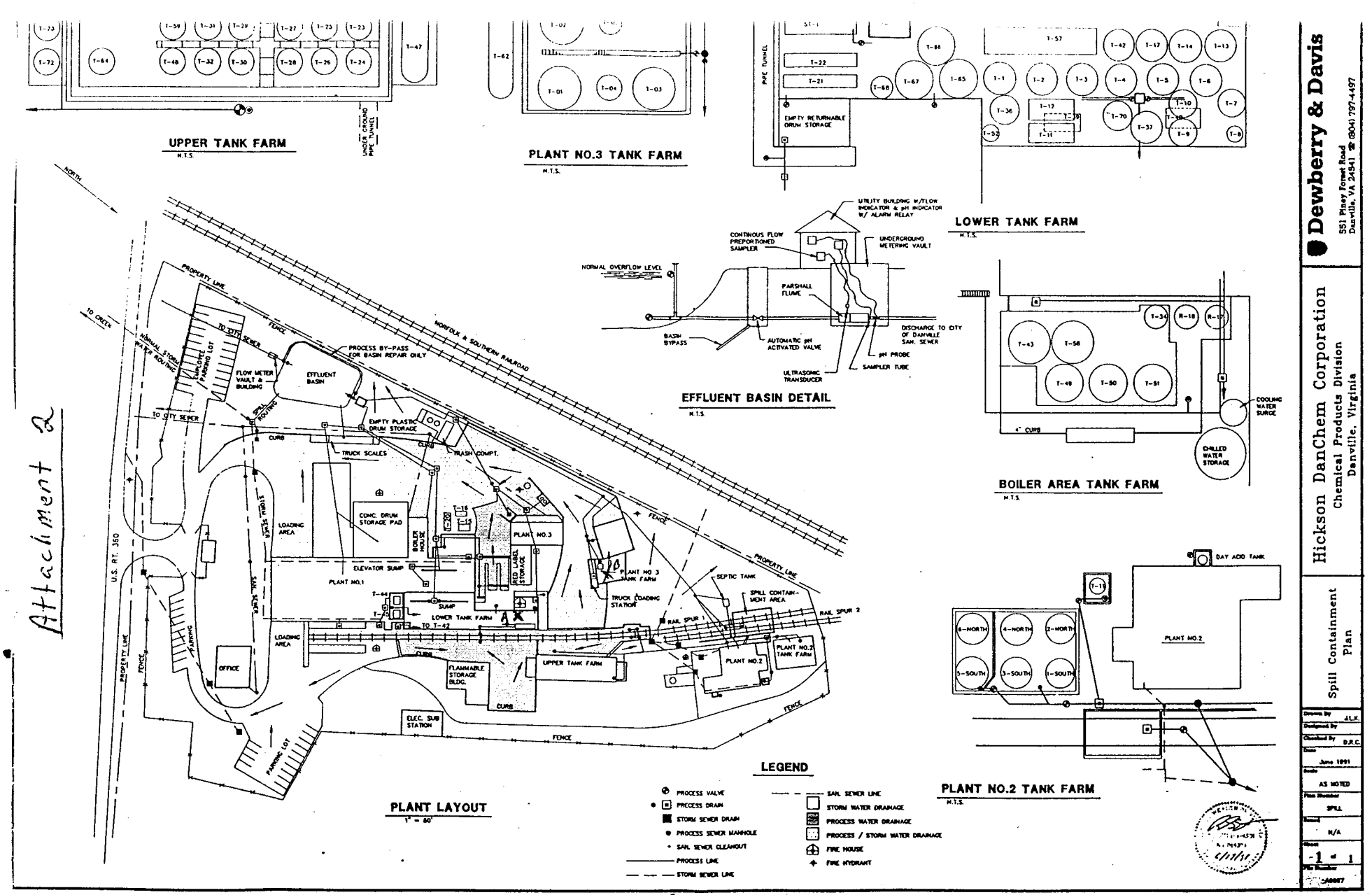
See Attachment 3

ATTACHMENT 1

WASTE STREAM	WASTE CODE	MAX. AMT. GENERATED/ MONTH	MAX. AMT. ACCUMULATED /MONTH
* MEK	F005	47040 LBS	47040 LBS
* TOLUENE	F005	5160 LBS	5160 LBS
* TOLUENE, BUTANOL	D001	16400 LBS	16400 LBS
* METHANOL	D001	7600 LBS	7600 LBS
* CYCLOHEXANE,ETHYL ACETATE	D001	41360 LBS	41360 LBS
* ACETONE	F003, D001	46960 LBS	46960 LBS
* ETHYLENE GLYCO MONO-ETHLY ETHER ACETATE	D001	40340 LBS	40340 LBS
* PYRIDINE	F005	2000 LBS	2000 LBS
* ETHLY ETHER, BENZENE	F003, F005	8200 LBS	8200 LBS
* TOLUENE, ACETONE	F002,F003 F005,D022	400 LBS	400 LBS
* NAPHTHA	D001	90 LBS.	90 LBS
* BIPHENYL	D001	40 LBS	40 LBS
* TRICHLOROETHYLENE, 111-TRICHLOROETHANE	U226, U228	40 LBS	40 LBS
* ETHYLENE DICHLORIDE	U077	400 LBS	400 LBS
* TOLUENE,VINYL METHYL ETHER	F003, F005	1200 LBS	1200 LBS
* ISOPROPANOL, DODECYL BENZENE	D001	1600 LBS	1600 LBS

* = LAND BAN NOTIFICATION INCLUDED WITH MANIFEST

Attachment 2



Dewberry & Davis
551 Piney Forest Road
Danville, VA 24541 ☎ (804) 797-4497

Hickson DanChem Corporation
Chemical Products Division
Danville, Virginia

Spill Containment Plan

Drawn By	J.L.K.
Designed By	
Checked By	D.R.C.
Date	June 1991
Scale	AS NOTED
Plan Number	SPILL
Revised	N/A
Sheet	1 of 1
File Number	CA0007

Area A

1.) Toluene/Butanol - 9-55gal. drums (D001)
* 2.) Acetic Acid 12-55gal. drums (D002)
* 3.) Pyridine 16-55gal drums (D002)
Total = 37 55gal drums

* = No Accumulation start date on several drums

Area B

1.) Cyclohexane, Ethyl Acetate/Toluene (F003) 12-55gal drums
2.) Laboratory Flamable Liquids (D001) 4- " " "
5- " " "
3.) Mix Cyclohexane (F005) 13- " " "
4.) Liquid Heptane (F005) 7- " " "
5.) Acetone (F003) 7- " " "
6.) Acetone Flush 48 " " "

Please print or type

Form Approved. OMB No. 2050-0028.
GSA No. 0246-EPA-OT

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only): JUL 6 1992

RECEIVED

A. First Notification: [ ]
B. Subsequent Notification: [X]

EPA ID Number: V A D 9 8 0 7 1 5 1 1 4

H I C K S O N   D A N C H E M   C O R P O R A T I O N

1 9 7 5   R I C H M O N D   B L V D .

D A N V I L L E — V A — 2 4 5 4 0 -

P I T T S Y L V A N I A

P . O .   B O X   4 0 0

D A N V I L L E — V A — 2 4 5 4 3 -

G A N N — P A T T Y

C H E M I C A L   C O N T R O — 8 0 4 - 7 9 9 - 4 8 3 9

[ ] X   P   O   B O X   4 0 0

D A N V I L L E — V A — 2 4 5 4 3 -

H I C K S O N   D A N C H E M   C O R P O R A T I O N

P   O   B O X   4 0 0

City or Town: D A N V I L L E — State: V A — ZIP Code: 2 4 5 4 3 -

8 0 4 - 7 9 7 - 8 1 0 0 — P — P — X — (Date Changed) Month 0 1 Day 1 1 Year 9 0

EPA Form 8700-12

Please print or type

Form Approved. OMB No. 2050-0028.
GSA No. 0246-EPA-OT

ID – For Official Use Only

VIII. Type of Regulated Waste Activity (Mark "X" in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [X] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220–2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes
   - Mode of Transportation
     - [ ] 1. Air
     - [ ] 2. Rail
     - [ ] 3. Highway
     - [ ] 4. Water
     - [ ] 5. Other – specify
- [ ] 3. Treater, Storer, Disposer (at installation)
- 4. Hazardous Waste Fuel
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketers
  - [ ] c. Burner – indicate device(s) – Type of Combustion Device
    - [ ] 1. Utility Boiler
    - [ ] 2. Industrial Boiler
    - [ ] 3. Industrial Furnace
- [ ] 5. Underground Injection Control

B. Used Oil Fuel Activities

- [ ] 1. Off-Specification Used Oil Fuel
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner – indicate device(s) – Type of Combustion Device
    - [ ] 1. Utility Boiler
    - [ ] 2. Industrial Boiler
    - [ ] 3. Industrial Furnace
- [ ] 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark "X" in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 – 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic
X			

List specific EPA hazardous waste number(s) for the Toxicity Characteristic Contaminant(s)

B. Listed Hazardous Wastes. (See 40 CFR 261.31 – 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
F003	F005				

7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title (type or print)	Date Signed
S J Jelich	S. J. Jelich, Vice Pres. Mfg.	6/16/92

XI. Comments

Notification for this facility was filed in January of 1990 and a new EPA ID Number VAD988170684 was assigned.

Note: Mail completed form to the appropriate EPA Regional or State Office.